# **EXHIBIT B**

Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.580 Filed 10/19/23 Page 2 of 107



#### ATTORNEYS AT LAW

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October 5, 2023

#### Via Email

Re: New Evidence Regarding Mel Tucker Matter

Dear Board of Trustees and Interim President Woodruff:

I write this letter on behalf of our client, Mel Tucker, as it appears that you have not been provided complete and accurate information regarding the "investigation" and surrounding circumstances that gave rise to Mr. Tucker's recent employment termination. Under Office of Institutional Equity ("OIE") rules, we are prohibited from participating in the hearing scheduled for October 5 and 6, 2023, because Mr. Tucker is not available due to a serious medical condition. However, we want to be certain that each of you are privy to some of the newly discovered evidence, primarily in the form of messages authored by Ms. Tracy herself but also including new witness statements, that she hoped (and obviously anticipated) you would never see.

We detail some of this new evidence below, although it is too voluminous to capture in a single letter. (We have received approximately 20,000 new communications or documents involving Ms. Tracy.) This evidence completely contradicts Ms. Tracy's claims and suggest that she manipulated a key witness, the University, Mr. Tucker, and the public. You should know that Ms. Tracy allegedly deleted key evidence and provided only self-serving excerpts to OIE to sustain a claim of "harassment" that MSU never should have been investigating in the first place. Ms. Tracy pulled the wool over the University's eyes, and maligned Mr. Tucker's reputation for personal gain.

At bottom, this new evidence undermines MSU's decision to terminate Mr. Tucker, and further confirms that the underlying "investigation" failed to meet minimal due diligence standards—at Mr. Tucker's expense.

1. Ms. Tracy's *Own Statements* Confirm that She Had (Simultaneous) Consensual Personal Relationships with Mr. Tucker and at Least One Other Married Coach, Contrary to What She Told the Investigator.

We now know that there are literally *hundreds* of messages from Ms. Tracy *herself*, as well as statements from other witnesses, reflecting Ms. Tracy's completely consensual (and

<sup>&</sup>lt;sup>1</sup> Given OIE's inability to secure the confidentiality of its proceedings, and the University General Counsel's indifference to Mr. Tucker's Family Medical Leave Act request, we have not provided medical evidence for public consumption, but documentation exists to substantiate the serious medical condition.



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simultaneous) personal relationships with Mr. Tucker and at least one other married coach who had previously engaged Ms. Tracy to provide training to his team. Ms. Tracy misrepresented these relationships.

Ms. Tracy told the investigator that she told Mr. Tucker she was "single on purpose" and that she does "not date people in [her] field." Even one of Ms. Tracy's lawyers (Ms. Swanson) vouched for her on the record, claiming that "in all her years of knowing [Ms. Tracy], she had never known [her] to date or otherwise become romantically involved with anyone with whom [she] had a professional relationship." Ms. Tracy repeatedly made these bold claims to falsely suggest that her relationship with Tucker was necessarily one-sided.

Yet Ms. Tracy's own words paint a different picture. She admitted in contemporaneous messages to Ahlan Alvarado, her now deceased close friend of 21 years (and a key witness in this case given Ms. Alvarado's additional role as her assistant), that she had a consensual relationship with coach Damon Stoudamire—saying she was "dating" him and had a "good thing with Damon." To be sure, Ms. Tracy had previously worked with Mr. Stoudamire—and even remarked to Ms. Alvarado that "Damon had 2 reasons for bringing me to speak to his college team." Ms. Tracy's relationship with Mr. Stoudamire overlapped with Ms. Tracy's intimately personal relationship with Mr. Tucker. The below messages are illustrative:

**Ms.** Tracy: I haven't even heard from Damon since Monday. . . .

Ms. Alvarado: He'll pop up.

**Ms.** Tracy: For sure. He's not going nowhere. Lol. He was supposed to find time to see me before the 20th. . . .

**Ms.** Tracy: Coach Tucker told me he loved me last night. It wasn't weird tho. He made sure I knew it was about being a friend.

**Ms.** Alvarado: In other news lol. Coach Tucker isn't going anywhere either.

**Ms.** Tracy: Def not lol. He went to some retreat for his birthday. Came back all zen. He's one of those – in another life. . . . I guess they talked about trauma and he said he thought about me and how amazing it is that i can speak about mine. He said I'm a brilliant

<sup>&</sup>lt;sup>2</sup> See September 10, 2021 text exchange, attached. Portions of the text messages that are not cited in this letter have been redacted.

<sup>&</sup>lt;sup>3</sup> See April 17, 2022 text exchange, attached.



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human and too special for this world. Damon is so cute in his tight shirt and pants lol. I like seeing him on tv.

This exchange reflects that in one breath Ms. Tracy enjoyed Mr. Tucker's attention, and literally in the next breath that she objectifies Damon as "cute" in tight clothing. Not only does this contradict Ms. Tracy's allegations that Mr. Tucker's attention caused her distress, it also decimates Ms. Tracy's claim that she would not consensually engage in a personal relationship with a coach.

Similarly disingenuous was Ms. Tracy's representation to the investigator that she would not accept gifts from Mr. Tucker after knowing that he was romantically interested in her. Her messages to Ms. Alvarado show that *after* she concluded Mr. Tucker had such interest, she told Ms. Alvarado that:

Michigan state might be going to the Rose Bowl or one of the other major ones. We should check this calendar and keep dates open. I know coach Tucker would give us tickets[.]<sup>5</sup>

-and-

Tucker signed his contract. I cant [sic] even wrap my brain around 95 million. Sheesh... Can you imagine around 700k going into your bank account every month. Every month... We're gonna make it happen... I'm gonna ask him to finance the doc part of it [marketing materials that Ms. Tracy wanted for her non-profit organization]... He'll do it.

Likewise, despite what she told the investigator about not having a personal relationship with a coach, Ms. Tracy seemed to enjoy Mr. Stoudamire's position. Indeed, during a visit to Mr. Stoudamire in Boston, Ms. Tracy sent a video of his living room and the view, telling Ms. Alvarado: "[h]e chose the flight that gets me there the earliest for us to spend more time together," that "[h]is place is so nice ," and that she "could get used to this lifestyle." Separately, having previously dated a DJ, Ms. Tracy commented to Ms. Alvarado: "[w]atching the DJ at halftime. Thank God I graduated to a coach on the bench LOL."

<sup>&</sup>lt;sup>4</sup> See, e.g., January 15, 2022 text exchange, attached.

<sup>&</sup>lt;sup>5</sup> See November 9, 2021 text exchange, attached.

<sup>&</sup>lt;sup>6</sup> See November 26, 2021 text exchange, attached (emphasis added).

<sup>&</sup>lt;sup>7</sup> See October 29, 2021 text exchange and October 31, 2021 text exchange, attached.

<sup>&</sup>lt;sup>8</sup> See October 27, 2021 text exchange, attached.



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## 2. A New Witness – the Only Witness *Under Oath* – Has Said That Ms. Tracy and Mr. Tucker's Phone Sex Call Was Consensual.

Additional new evidence eliminates the "she said, he said" posture of this case. Instead, a new witness familiar with Ms. Tracy's representations regarding their relationship has come forward under oath in a sworn affidavit and flat out said that Ms. Tracy and Mr. Tucker "were in some sort of relationship when the conversation took place . . . the phone sex was consensual." No other witness, including Ms. Tracy herself, has made any statement under oath.

Further, as also revealed by this new witness, Ms. Tracy went to extraordinary lengths to try to stop Ms. Tracy's written communications (a fraction of which are referenced in this letter) with Ms. Alvarado from ever seeing the light of day. As detailed in the new witness's sworn statement, while Ms. Tracy's supposed friend lay dying in a hospital, and even after her death, Ms. Tracy sought to sleep over at Ms. Alvarado's house (in her room) and repeatedly asked Ms. Alvarado's family for access to Ms. Alvarado's phone and computers:

It really struck me odd that she would want Ahlan's things and would be asking Ahlan's family for them as Ahlan lay dying in her hospital bed.

\*\*\*

Another [odd] comment Brenda made in the hospital, after the doctor told us that Ahlan was not going to make it, Brenda stated that "I need to call my therapist because I don't feel supported right now".

This apparent attempted cover-up alone should tell you about the type of person who made these baseless allegations against Mr. Tucker. Ms. Tracy's shocking efforts to obtain access to Ms. Alvarado's electronic devices containing evidence against her reveals how desperately she wanted and needed to ensure their contents were never disclosed.

Indeed, Ms. Tracy omitted some of this evidence when providing self-serving selective excerpts of her text messages with Ms. Alvarado to the investigator. As one example, Ms. Tracy provided the below text exchange to the investigator to insinuate that Mr. Tucker brought her to the Spring Game with ulterior motives:

**Ms. Tracy**: I saw an interview with Tucker about the practice and he said "Brenda Tracy was in town and educating our players is important" or something similar but not she's serving as captain. Or we're wearing shirts to raise awareness or even a mention of set the

<sup>&</sup>lt;sup>9</sup> The under oath affidavit will be made available for review by the Trustees should they desire to discuss this matter.



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expectation. I wonder if it's bc of the behind the scenes stuff that he's now being weird[.] Like he's nervous to talk about me now? "She's in town" what??

**Ms. Alvarado**: who knows fren. Men are weird no matter what. They think acknowledging is doing something. I don't see why it's a secret, they announced you at the game?

**Ms.** Tracy: Idk but he didn't do a good job. I expected more from him

Ms. Alvarado: Agree

**Ms.** Tracy: Don't have me there if you aren't going to talk about it. We're not checking boxes

**Ms.** Alvarado: They took care of us but the important part was to raise awareness

Ms. Tracy: Exactly. It's not about you and me

Ms. Alvarado: It's always about them somehow

**Ms.** Tracy: I gotta step all the way away. I can't have this messing with the message or mission[.] That's not something I can do

However, Ms. Tracy conveniently omitted her further texts to Ms. Alvarado—just two hours later—affirming that, actually, once MSU posted about her on social media everything was good and she was feeling positive about Mr. Tucker. She specifically excluded reference to her statements that:

MSU posted and Coach isn't being weird at all. Feels like all is good[.] And I all of a sudden have a tshirt discussion with licensing at MSU and some non athletic staff and a T-shirt company[.] Blessings on blessings when you stay the course and do what's right. . . . No regrets. My heart is good and so is my conscience[.] 10

Ms. Tracy hid the true nature of her sentiment toward Mr. Tucker following the Spring Game to try to convince OIE that she had a legitimate harassment claim. At the same time, OIE failed to attempt to get fulsome text exchanges from Ms. Alvarado or Ms. Tracy on these key

<sup>&</sup>lt;sup>10</sup> See April 17, 2022 text exchange (emphasis added), attached.



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points. Instead, the University then relied on Ms. Tracy's depiction of the relationship to wrongly malign, and ultimately fire, Mr. Tucker.

#### 3. Ms. Tracy Manipulated MSU For Her Own Financial Gain

Ms. Tracy and her lawyer repeatedly proclaimed in the national media that the University violated her privacy rights by leaking information of the investigation to the media, which prompted MSU to conduct an investigation into the source of that purportedly unknown leak. Behind the scenes, however, Ms. Tracy's own communications show that <u>she</u> shared information with multiple members of the media in an attempt to shape the narrative **several months in advance** of the investigation's completion. Specifically—in addition to telling various individuals affiliated with her organization about the investigation—Ms. Tracy discussed the investigation with two different ESPN reporters in March and May 2023, respectively, before reaching an exclusive deal with USA Today in June 2023. One of those ESPN reporters told Ms. Tracy as early as May 2023 that ESPN was sending "FOIAs" although the University failed to inform Mr. Tucker of that fact until August. Regardless, it is beyond reason that a leak of her name would justify Ms. Tracy's leaking a 1200 page confidential report to USA Today in violation of school policy.

We also now know from Ms. Tracy's own messages that she used MSU's "investigation" process because she was motivated by money, despite that she has claimed that she "has not mentioned money a single time in connection with [this matter]." Among other things, Ms. Tracy's messages reveal that:

- She was initially hoping for a quick settlement with Mr. Tucker, telling Ms. Alvarado: "I'm filing a formal complaint with MSU... [My lawyer] said after that we can let him know that we want to come to an agreement then it doesn't have to go to a hearing or anything unless he wants it to." <sup>14</sup>
- She told Ms. Alvarado that her attorney was reaching out to MSU regarding a settlement and that "Money is my only recourse to make him feel like there is a

<sup>11</sup> Although Mr. Tucker had long since demanded such an investigation, MSU did not even provide the common courtesy of acknowledging such requests. Interestingly, in a <u>draft</u> press release referenced by The State News on September 27, 2023 (nearly two weeks after the draft was supposedly shared with MSU General Counsel Brian Quinn), Ms. Tracy's lawyer claimed that "[s]omeone associated with the MSU Board of Trustees disclosed [Ms. Tracy's] identity to an outside party," and "[t]hat outside party shared her identity with local media." (Emphasis added.) The statement that Ms. Tracy's lawyer *actually* released after review by an MSU official, however, was far less specific.

<sup>&</sup>lt;sup>12</sup> See March 15, 2023 and May 16, 2023 text exchanges, attached.

<sup>&</sup>lt;sup>13</sup> See March 19, 2023 text exchange, attached.

<sup>&</sup>lt;sup>14</sup> See December 9, 2022 text exchange, attached.



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punishment[.] . . . When they do the money I should make him pay me 10k directly[.]"15

- As noted above, Ms. Tracy had long been focused on counting Mr. Tucker's money and was plotting to get some of it herself: "Tucker signed his contract. I cant [sic] even wrap my brain around 95 million. Sheesh... Can you imagine around 700k going into your bank account every month. Every month... We're gonna make it happen... I'm gonna ask him to finance the doc part of [marketing materials that Ms. Tracy wanted]... He'll do it."
- About one week before she filed her complaint against Mr. Tucker, she admitted "she was down to \$5."<sup>17</sup>
- Then, after having filed her complaint against Mr. Tucker, Ms. Tracy told Ms. Alvarado to "imagine the victim is taking on a \$95M coach." (Ms. Tracy often refers to herself in the third person as "the victim," as well as "good victim," in this matter. (19)
- In connection with realizing that she "was supposed to be paying down 2018 taxes and not staying caught up on the other years," Ms. Tracy remarked that "[h]aving the IRS after me in a way that is known publicly surely won't help my lawsuit."<sup>20</sup>

At the same time, Ms. Tracy's texts reveal that she appears to have made a career out of misleading and manipulating people. She admitted – in writing – that she engages in "professional crying . . . when I share my story." In addition, even though she was in what she called "dire straits" financially, Ms. Tracy remarked that "[m]y priority is face lift and filming myself so we can make this [money]." In other words, she appears to be focused on appearances over reality.

#### 4. OIE's Investigation Failed

Our complaints about OIE's misguided, incomplete, and biased investigation, including the lack of jurisdiction to investigate this matter in the first place, are well documented. We are now faced with the uncomfortable reality that had the investigation been thorough, the information contained herein, and much more, would have resulted in the dismissal of this case. As detailed

<sup>&</sup>lt;sup>15</sup> See September 1, 2021 text exchange, attached

<sup>&</sup>lt;sup>16</sup> See November 26, 2021 text exchange, attached.

<sup>&</sup>lt;sup>17</sup> See December 10, 2022 text exchange, attached.

<sup>&</sup>lt;sup>18</sup> See December 27, 2022 text exchange, attached.

<sup>&</sup>lt;sup>19</sup> See February 27, 2023 text exchange, attached.

<sup>&</sup>lt;sup>20</sup> See December 19, 2022 text exchange, attached.

<sup>&</sup>lt;sup>21</sup> See December 27, 2022 text exchange, attached.

<sup>&</sup>lt;sup>22</sup> See December 14, 2021 text exchange, attached.



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above, the investigation failed miserably to verify the statements made by Ms. Tracy and failed to attempt to obtain a complete picture of Ms. Tracy's relationship with Mr. Tucker. Had the investigator simply asked for all messages between Ms. Tracy and her friend of 21 years, who also served as her assistant, and who was the key witness offered by Ms. Tracy, Ms. Tracy's misrepresentations and manipulation would have come to light months ago. And crucially, OIE would have (or at least should have) halted this investigation once and for all.

This certainly is not a proud moment in Spartan history, and it continues to cast a post-Nassar shadow on an institution that I, as an alumna, hold to a higher standard. Please contact me directly if you would like to further discuss the information that the OIE investigation failed to uncover.

Sincerely,

Jennifer Z. Belveal

cc: Brian Quinn (via email)
Melvin G. Tucker

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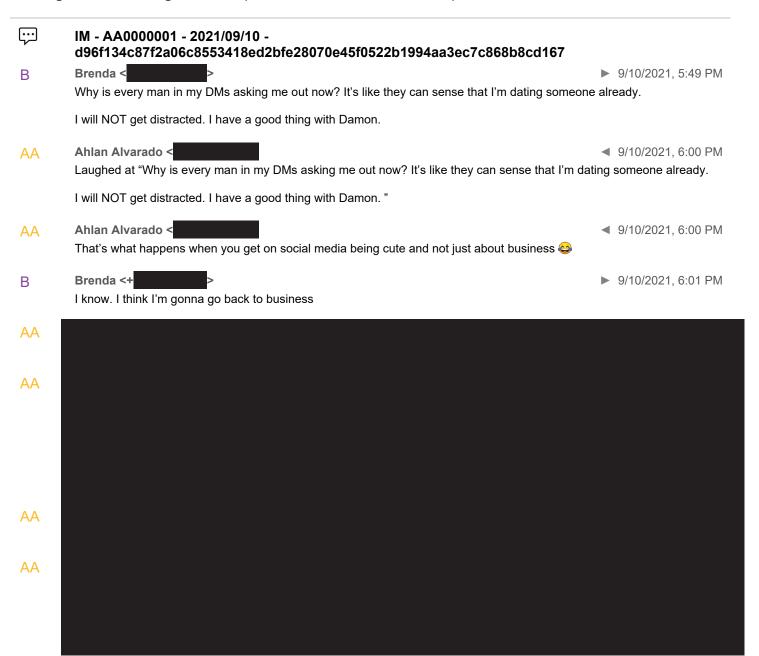
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Conversations: 1	Participants: 2
Total Messages: 8	Date Range: 9/10/2021

#### **Outline of Conversations**



**Messages in chronological order** (times are shown in GMT -04:00)



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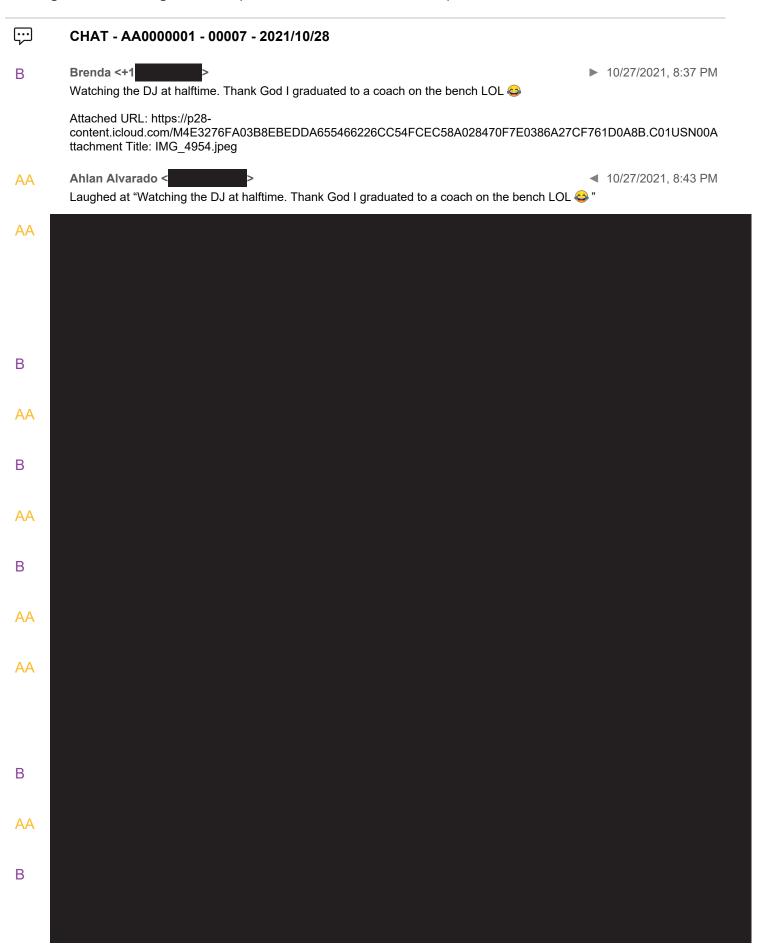
### **Short Message Report**

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Total Messages: 17	Date Range: 10/27/2021 - 10/28/2021

#### **Outline of Conversations**



**Messages in chronological order** (times are shown in GMT -04:00)



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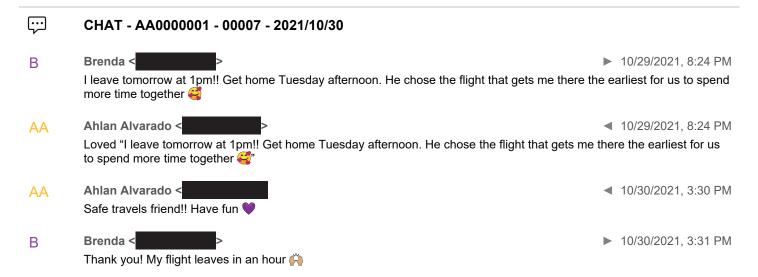
### **Short Message Report**

Conversations: 1	Participants: 2
Total Messages: 4	Date Range: 10/29/2021 - 10/30/2021

#### **Outline of Conversations**



**Messages in chronological order** (times are shown in GMT -04:00)



## Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.595 Filed 10/19/23 Page 17 of 107

### **Short Message Report**

Conversations: 1	Participants: 2
Total Messages: 83	Date Range: 10/31/2021

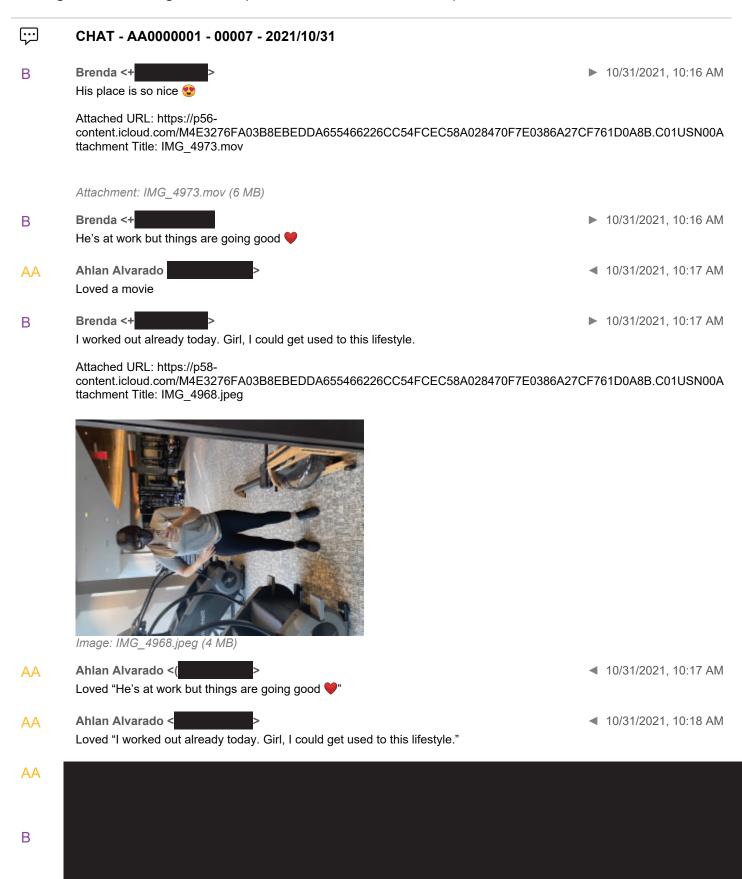
#### **Outline of Conversations**

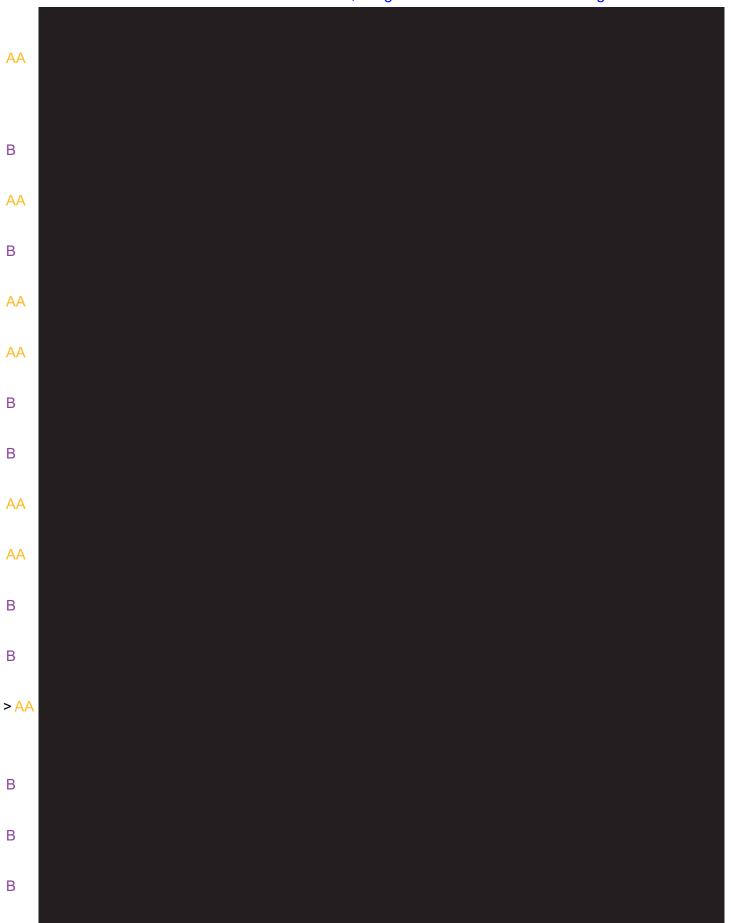


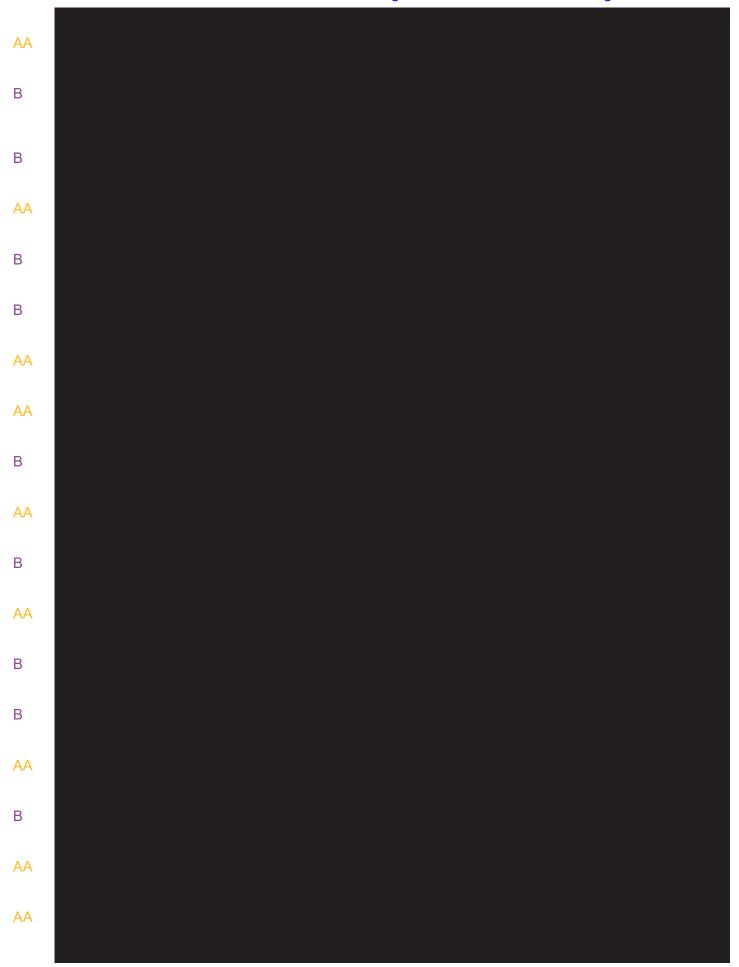
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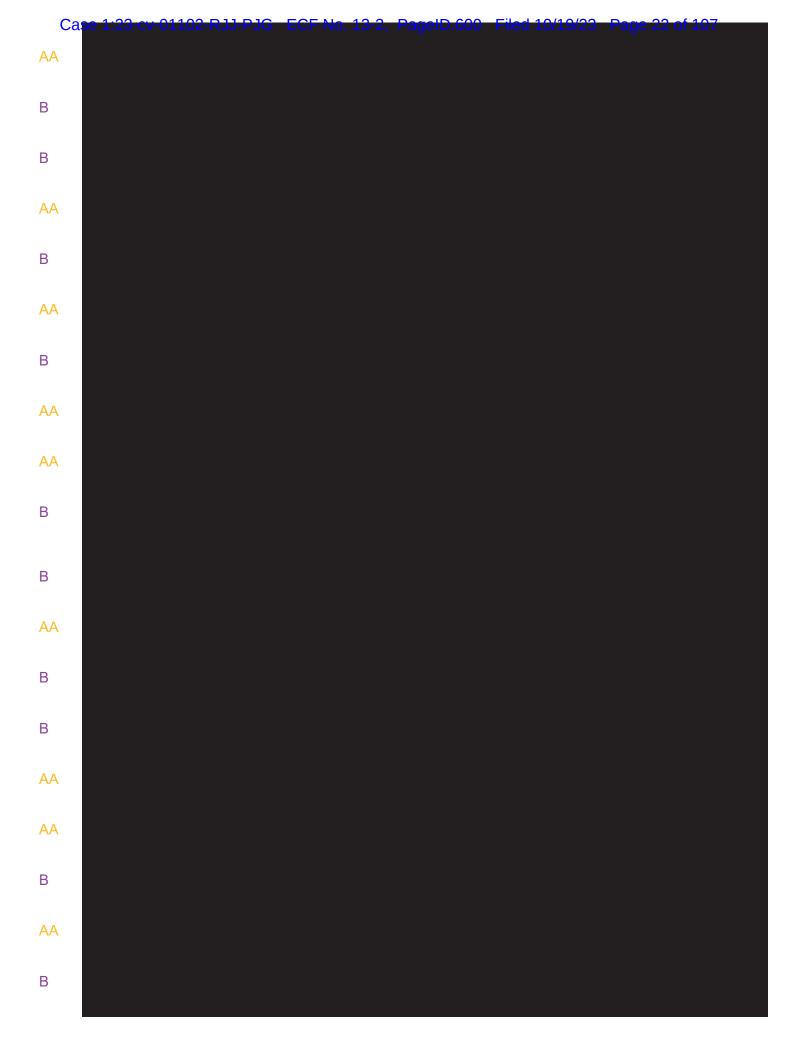
#### **Messages in chronological order** (times are shown in GMT -04:00)

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## Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.602 Filed 10/19/23 Page 24 of 107

### **Short Message Report**

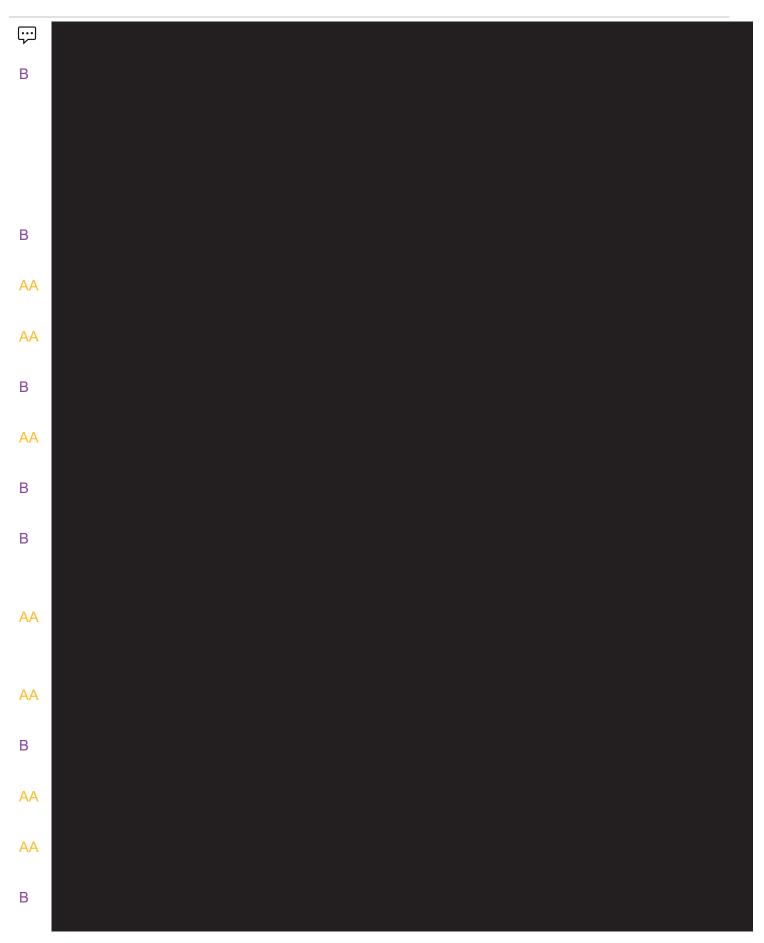
Conversations: 1	Participants: 2
Total Messages: 103	Date Range: 11/8/2021 - 11/9/2021

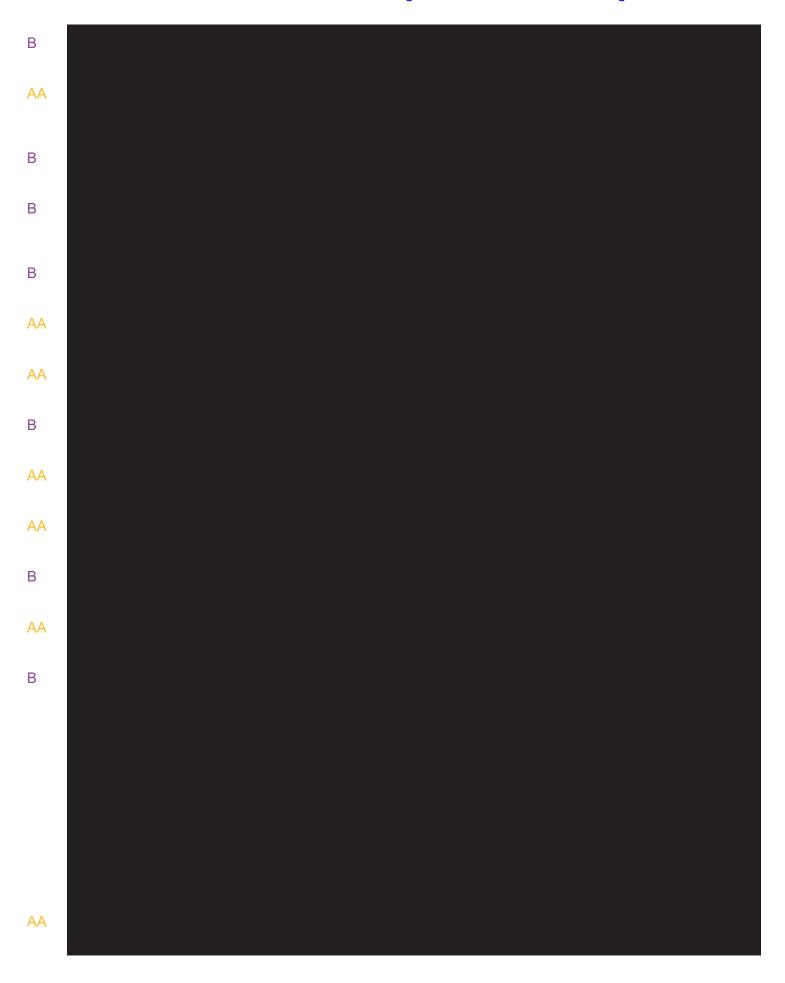
#### **Outline of Conversations**

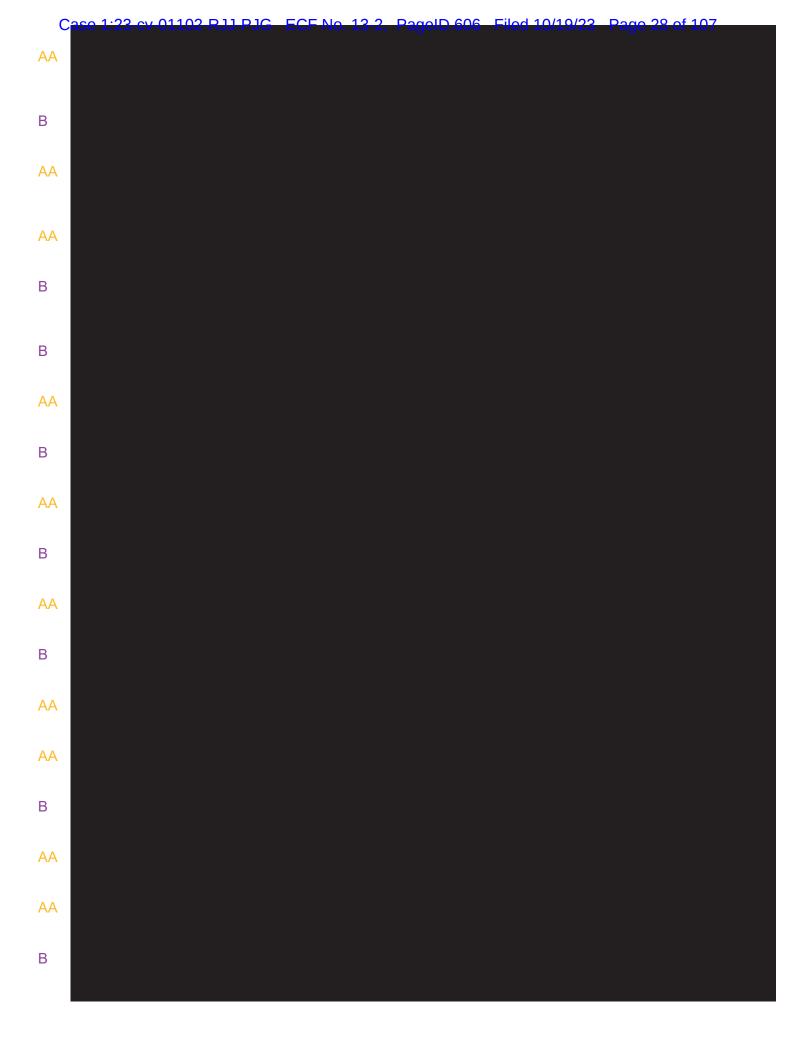


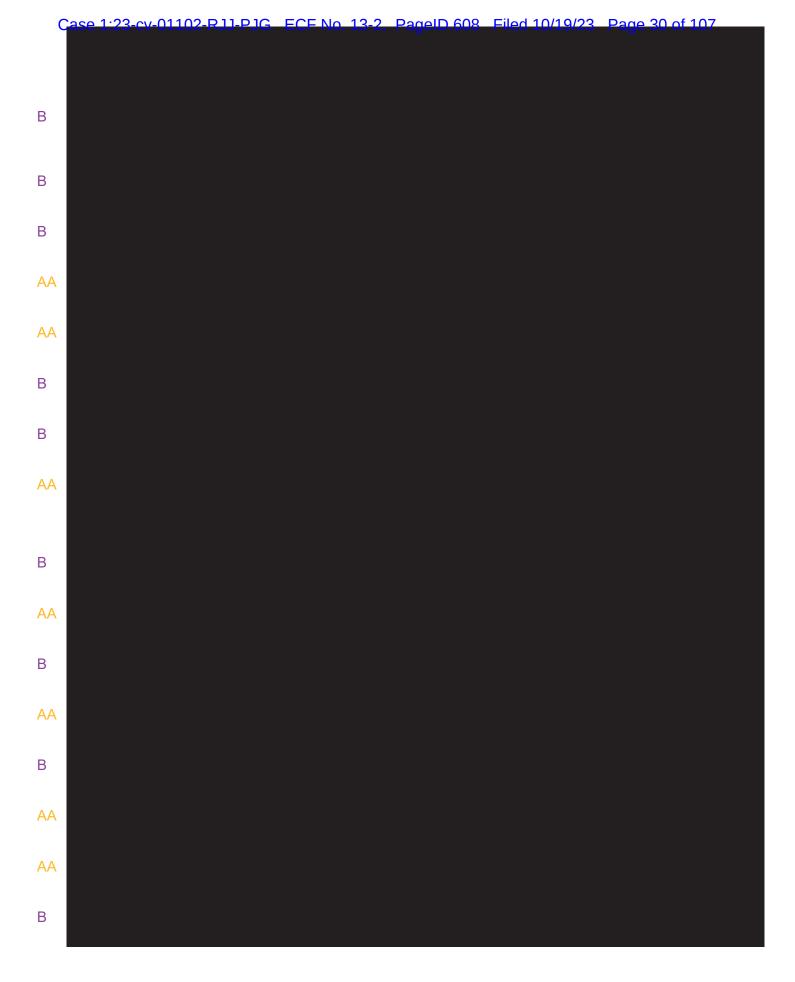
IM - AA0000001 - 2021/11/09 - d96f134c87f2a06c8553418ed2bfe28070e45f0522b1994aa3ec7c868b8cd167 • 103 messages between 11/8/2021 - 11/9/2021 • Ahlan Alvarado < > • Brenda <+ >

Messages in chronological order (times are shown in GMT -05:00)











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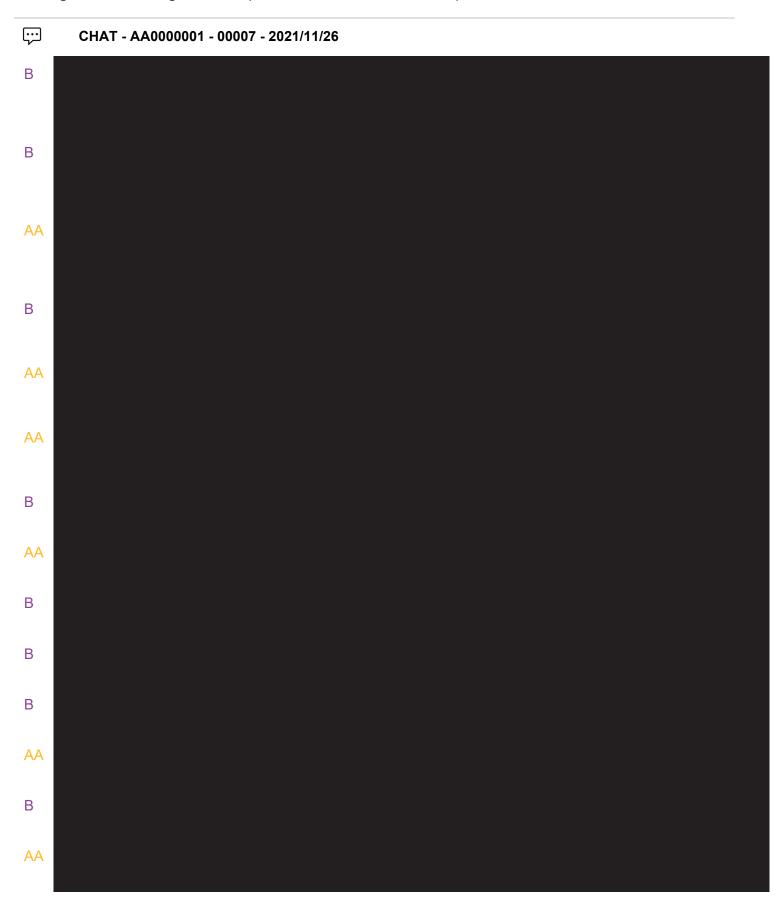
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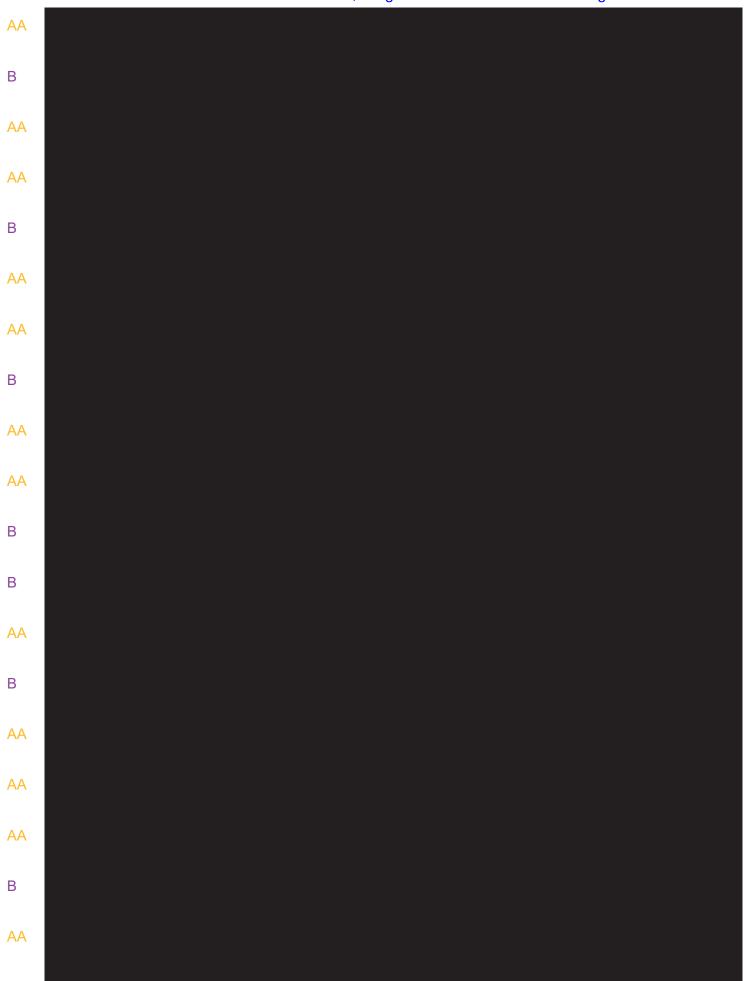
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Total Messages: 96	Date Range: 11/25/2021 - 11/26/2021

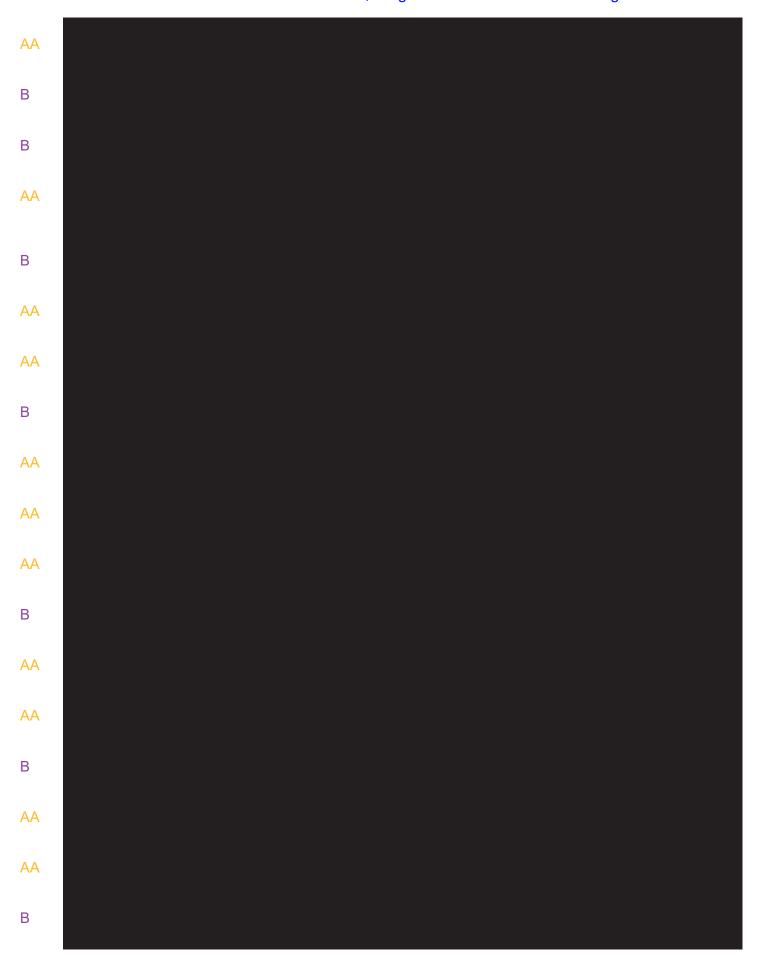
#### **Outline of Conversations**

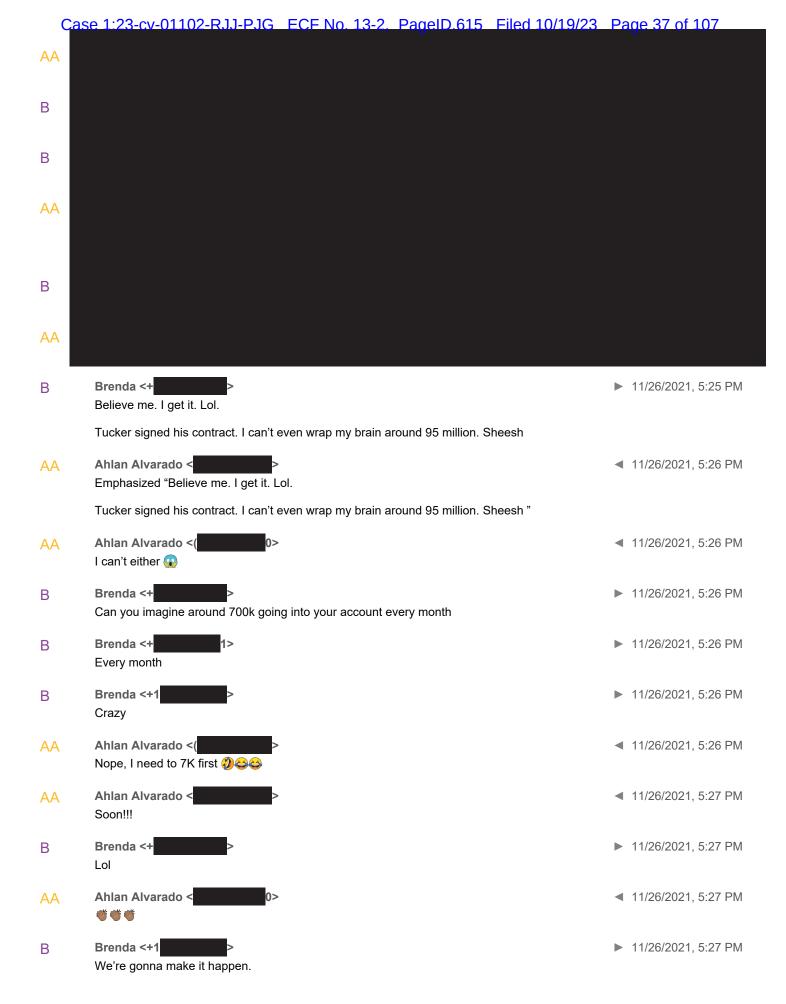


Messages in chronological order (times are shown in GMT -05:00)









#### Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.616 Filed 10/19/23 Page 38 of 107 В Brenda <+ ► 11/26/2021, 5:27 PM I'm gonna ask him to finance the doc part of it Ahlan Alvarado <( ■ 11/26/2021, 5:27 PM AA Loved "I'm gonna ask him to finance the doc part of it" Brenda <+ ► 11/26/2021, 5:27 PM В He'll do it Ahlan Alvarado < ■ 11/26/2021, 5:27 PM AAHe for sure will. Brenda <+ В ► 11/26/2021, 5:28 PM And sounds like I'll get booked this spring too so that's more money Ahlan Alvarado < ■ 11/26/2021, 5:28 PM AA Yes Cody reached back and said they are looking at dates for spring olimitsBrenda <+1 ► 11/26/2021, 5:28 PM В Perfect В AA

AA

В

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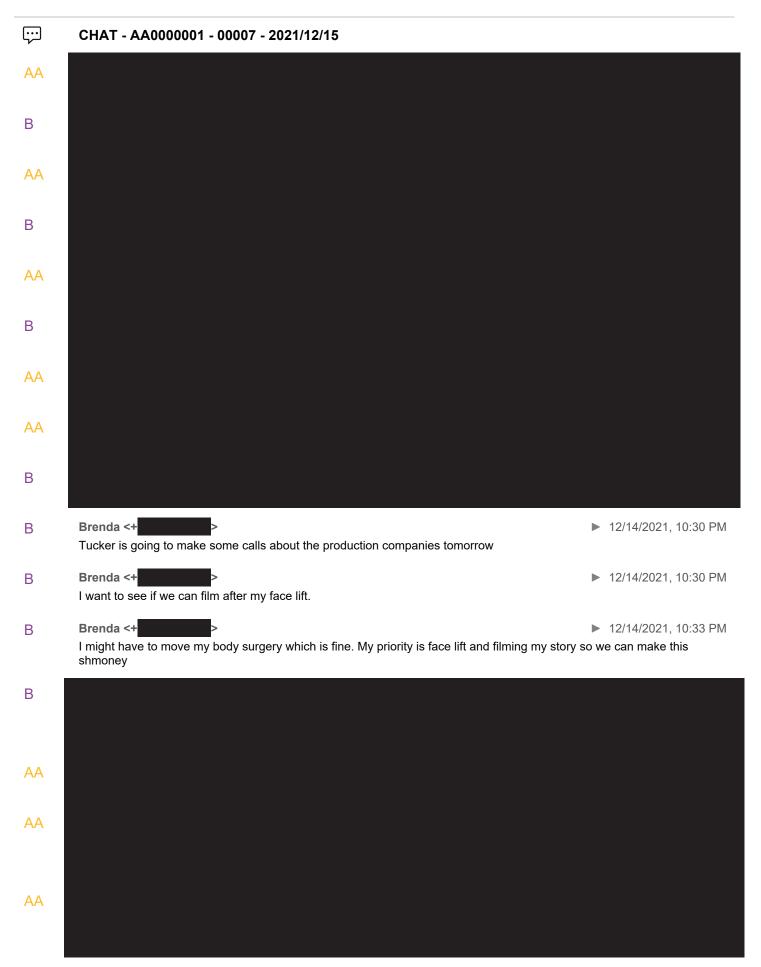
## **Short Message Report**

Conversations: 1	Participants: 2
Total Messages: 19	Date Range: 12/14/2021 - 12/15/2021

#### **Outline of Conversations**



**Messages in chronological order** (times are shown in GMT -05:00)





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## **Short Message Report**

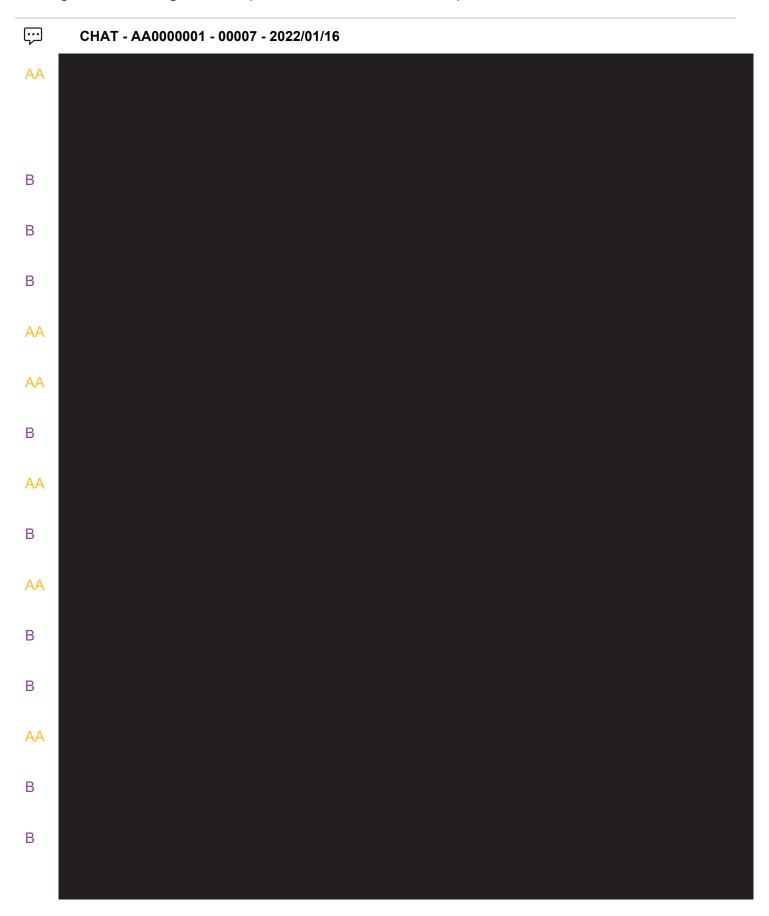
Conversations: 1	Participants: 2
Total Messages: 214	Date Range: 1/15/2022

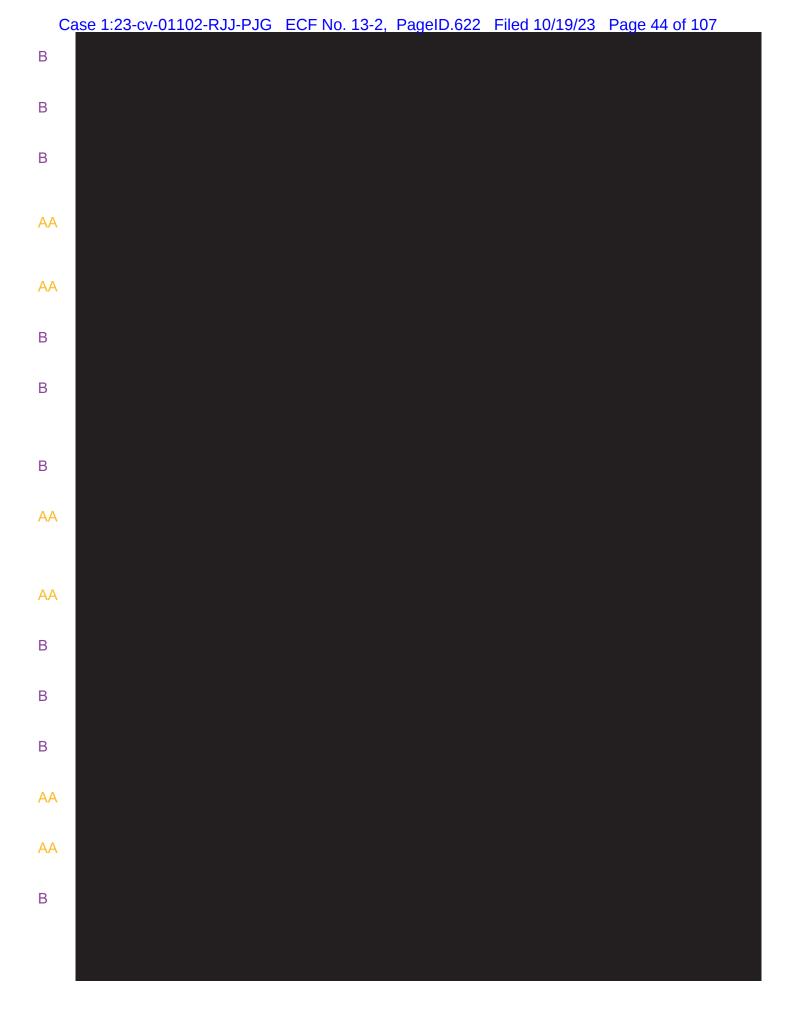
#### **Outline of Conversations**

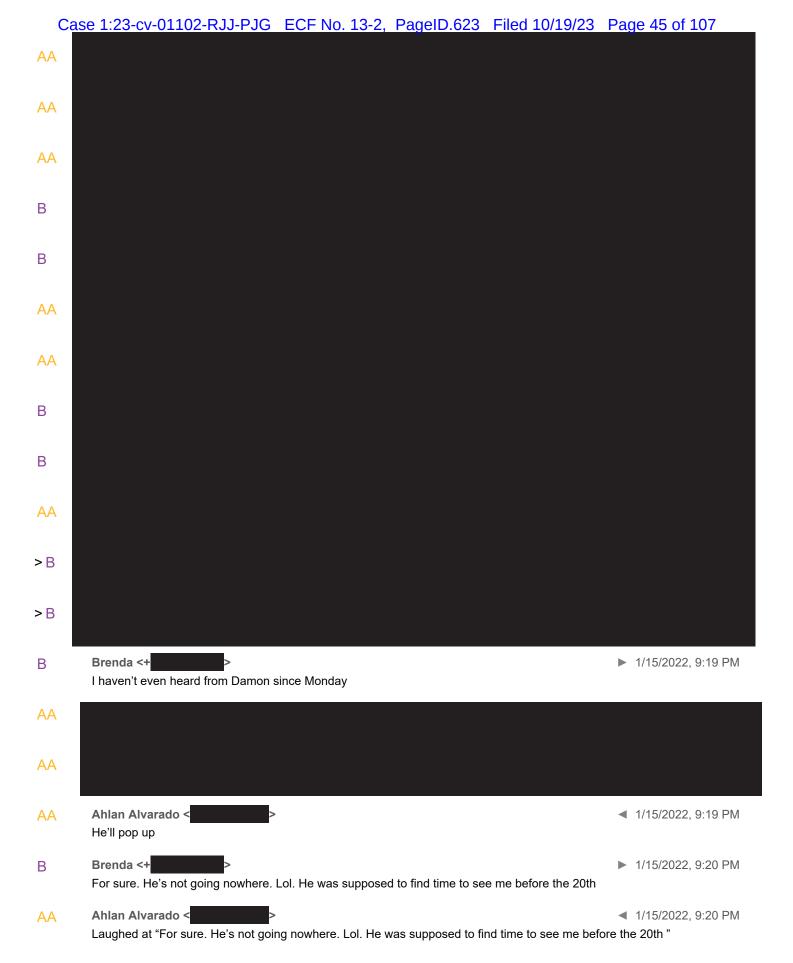


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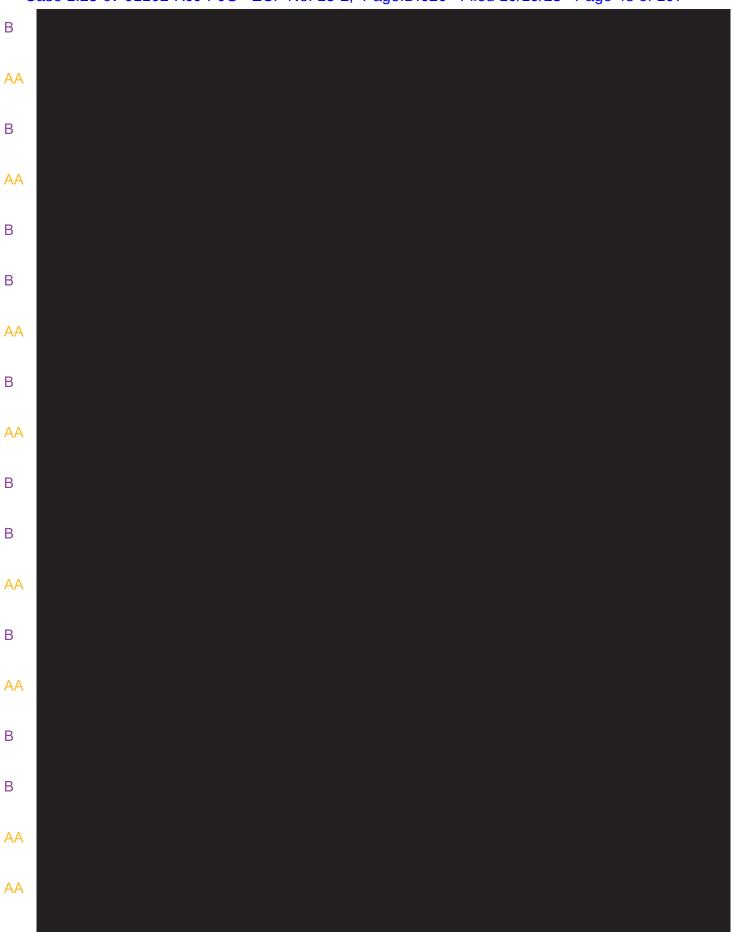
Messages in chronological order (times are shown in GMT -05:00)

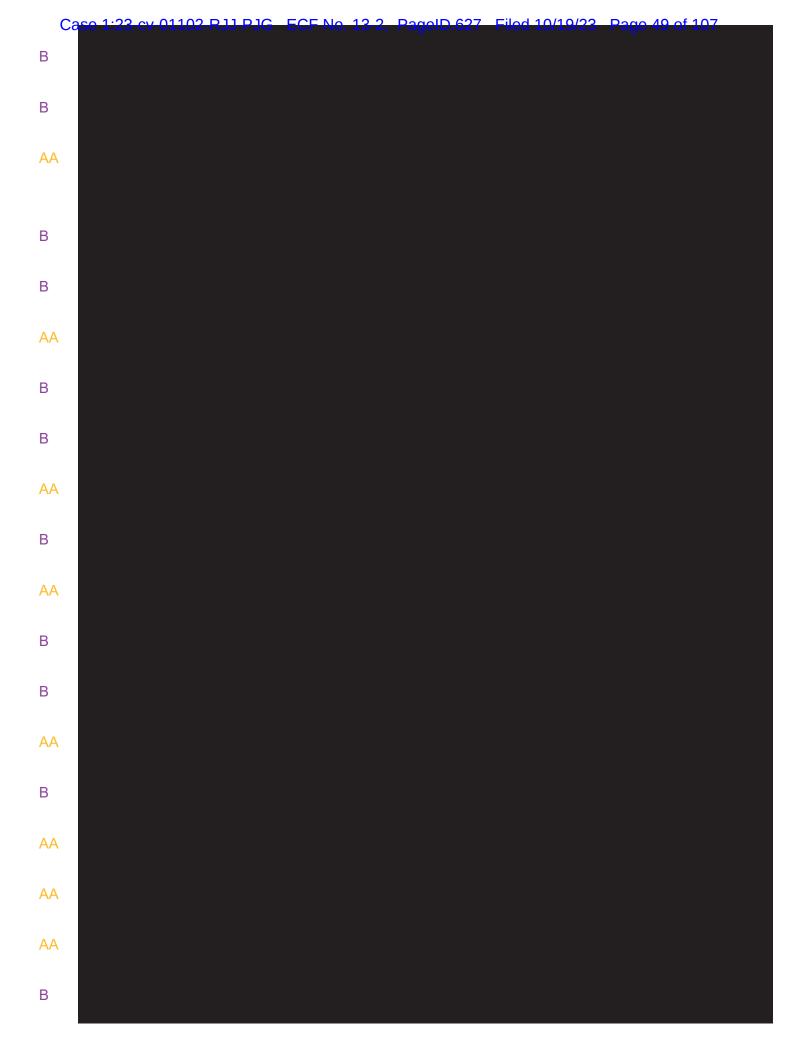


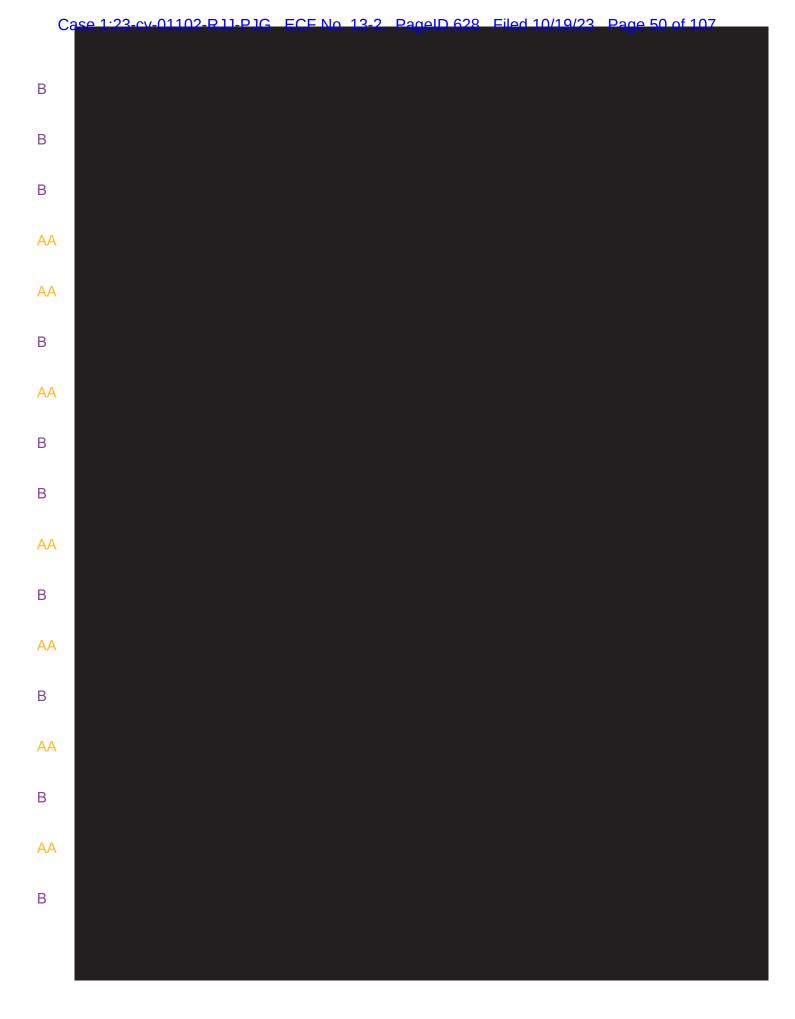


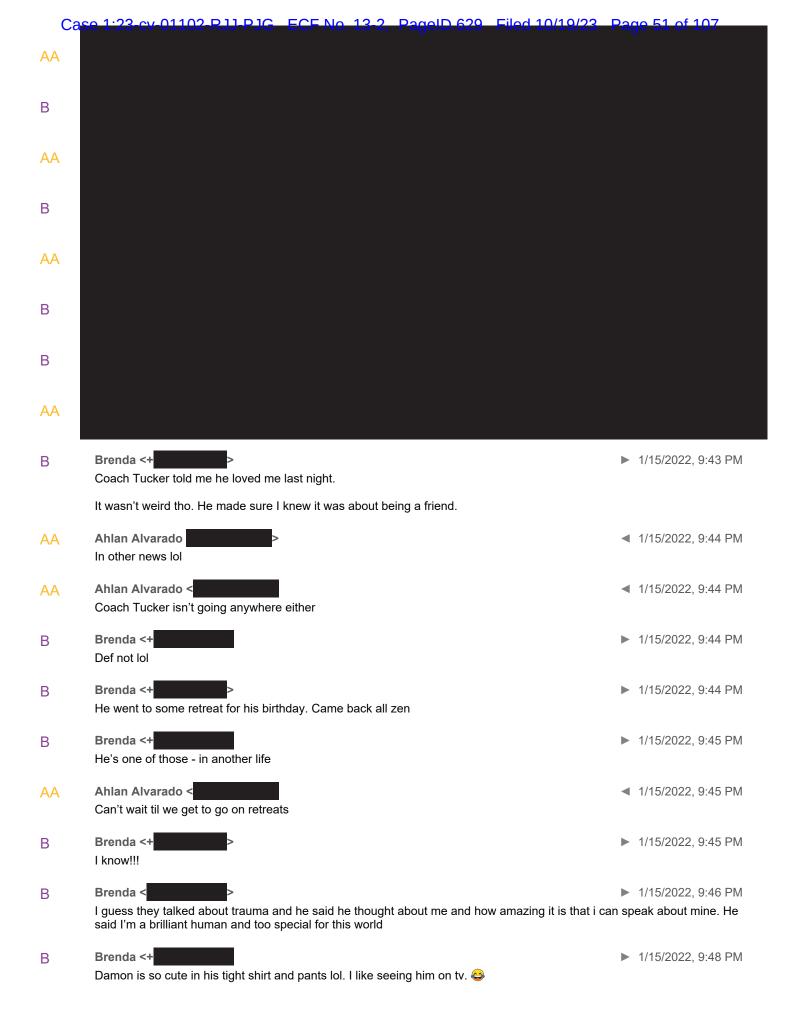


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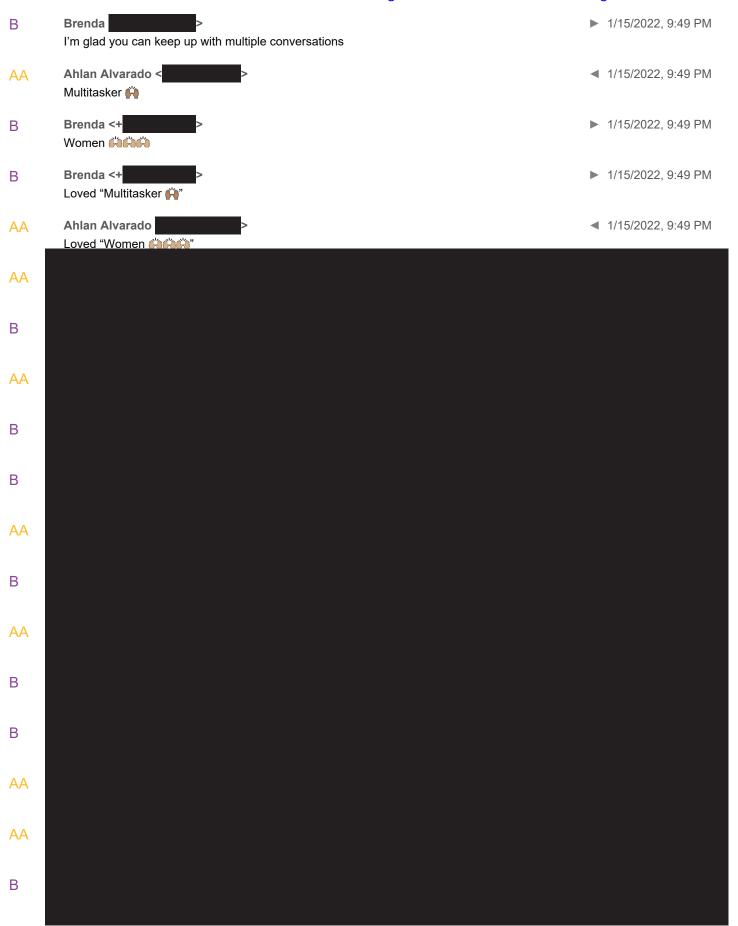








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# Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.634 Filed 10/19/23 Page 56 of 107

## **Short Message Report**

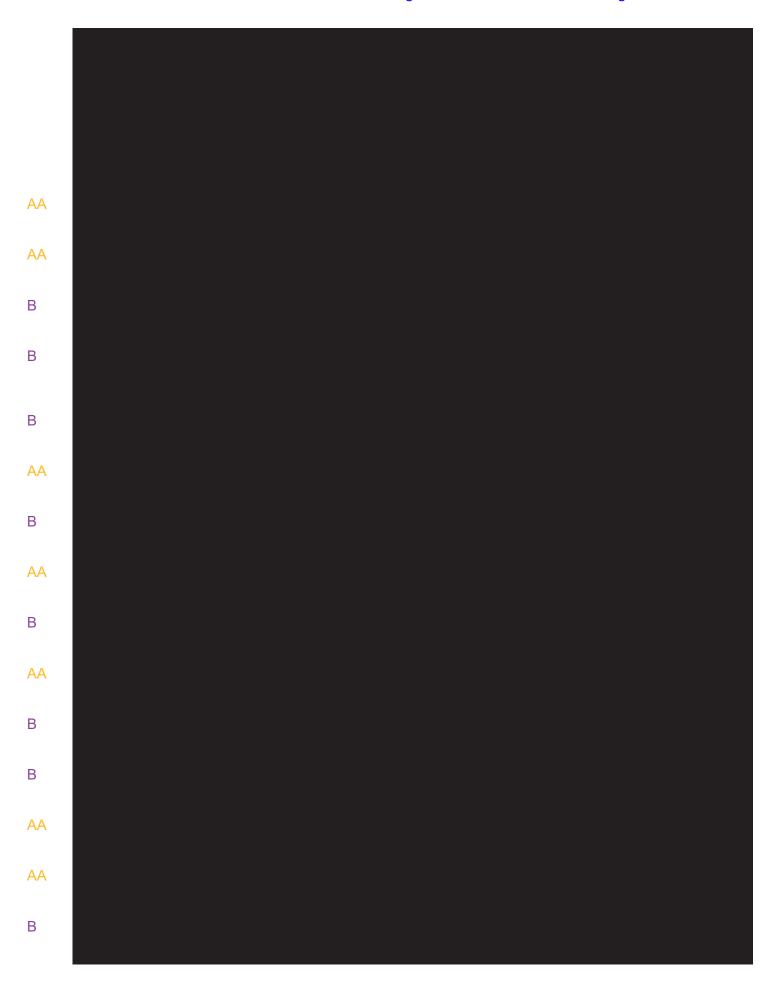
Conversations: 1	Participants: 2
Total Messages: 131	Date Range: 4/16/2022 - 4/17/2022

#### **Outline of Conversations**



Messages in chronological order (times are shown in GMT -04:00)









I saw an interview with Tucker about the practice and he said "Brenda Tracy was in town and educating our players is important" or something similar but not she's serving as captain. Or we're wearing shirts to raise awareness or even a mention of set the expectation

#### Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.639 Filed 10/19/23 Page 61 of 107 Brenda <+ В ► 4/17/2022, 12:24 PM I wonder if it's bc of the behind the scenes stuff that he's now being weird Brenda <+ ▶ 4/17/2022, 12:24 PM В Like he's nervous to talk about me now? Brenda <+ ▶ 4/17/2022, 12:25 PM В "She's in town" what?? Ahlan Alvarado < ◀ 4/17/2022, 12:27 PM AA secret, they announced you at the game? Brenda <+ ► 4/17/2022, 12:28 PM В Idk but he didn't do a good job. I expected more from him Ahlan Alvarado < ◀ 4/17/2022, 12:28 PM AA Agree Brenda <+ В ► 4/17/2022, 12:28 PM Don't have me there if you aren't going to talk about it. We're not checking boxes AA Ahlan Alvarado < ◀ 4/17/2022, 12:28 PM They took care of us but the important part was to raise awareness. В Brenda <+ ► 4/17/2022, 12:29 PM Exactly. It's not about you and me Ahlan Alvarado < ◀ 4/17/2022, 12:29 PM AA It's always about them somehow Brenda <+ ► 4/17/2022, 12:29 PM В I gotta step all the way away. I can't have this messing with the message or mission Brenda <+ ▶ 4/17/2022, 12:29 PM В That's not something I can do Ahlan Alvarado < ◀ 4/17/2022, 12:30 PM AA You know what to do Ahlan Alvarado < ◀ 4/17/2022, 12:30 PM AA It's just easy to get caught up Brenda <+ В ▶ 4/17/2022, 12:30 PM We'll just have to tell Liz we don't really know what the deal was and move forward but whatever all that was is over for me. Ahlan Alvarado < ◀ 4/17/2022, 12:31 PM AA Liked "We'll just have to tell Liz we don't really know what the deal was and move forward but whatever all that was is over for me. " Brenda <+1 ► 4/17/2022, 12:31 PM В I could care less about a relationship or whatever. My work means everything to me.

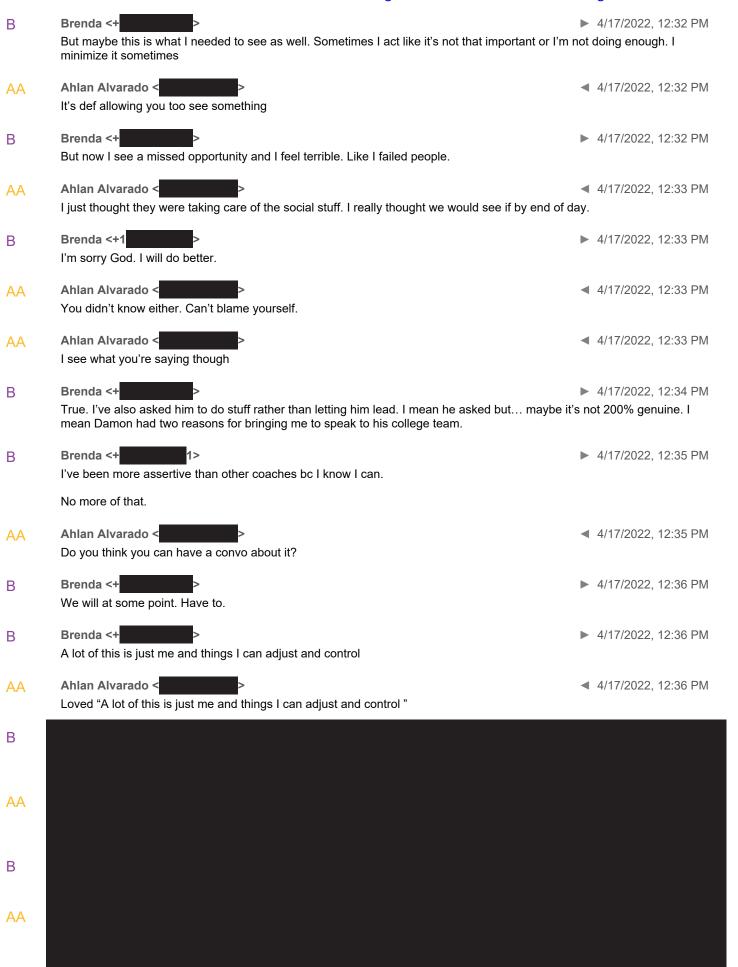
Loved "I could care less about a relationship or whatever. My work means everything to me."

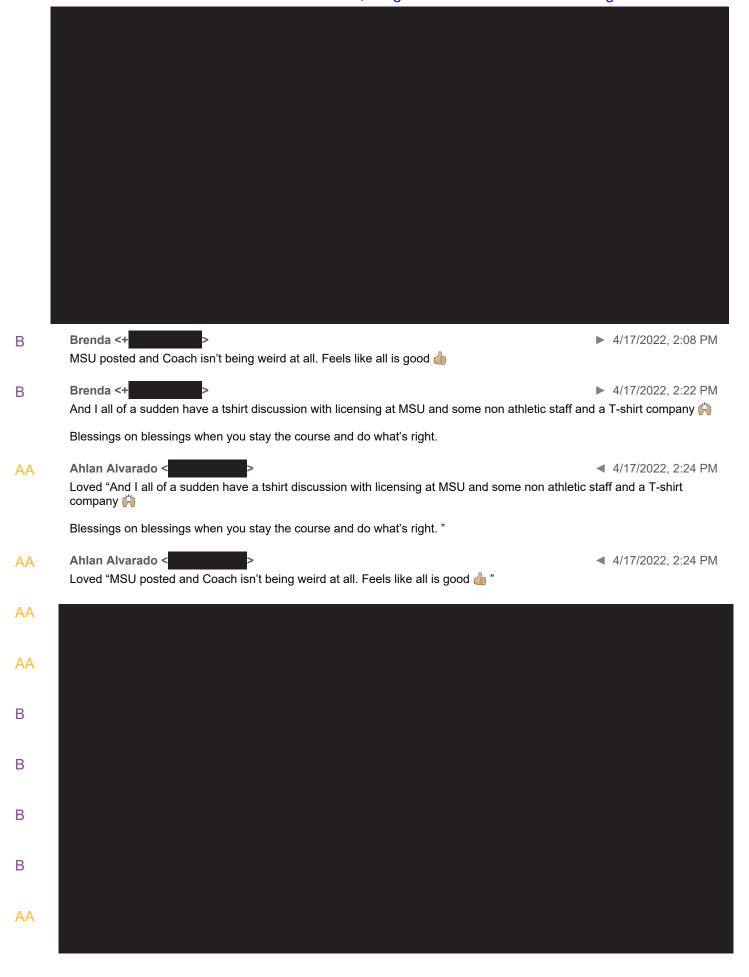
◀ 4/17/2022, 12:31 PM

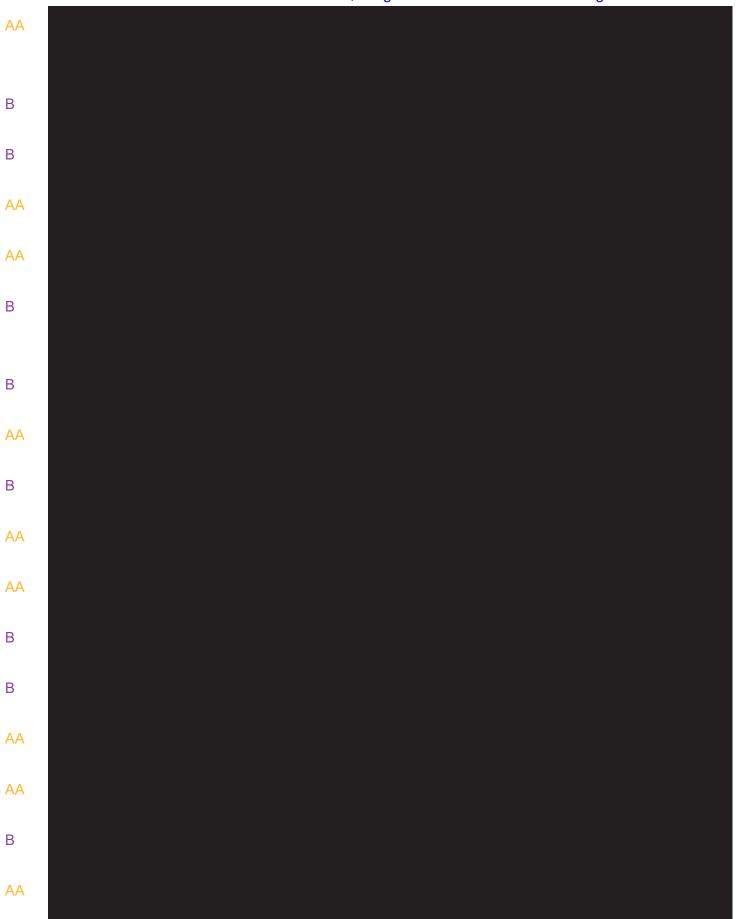
Ahlan Alvarado <

AA

#### Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.640 Filed 10/19/23 Page 62 of 107









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## **Short Message Report**

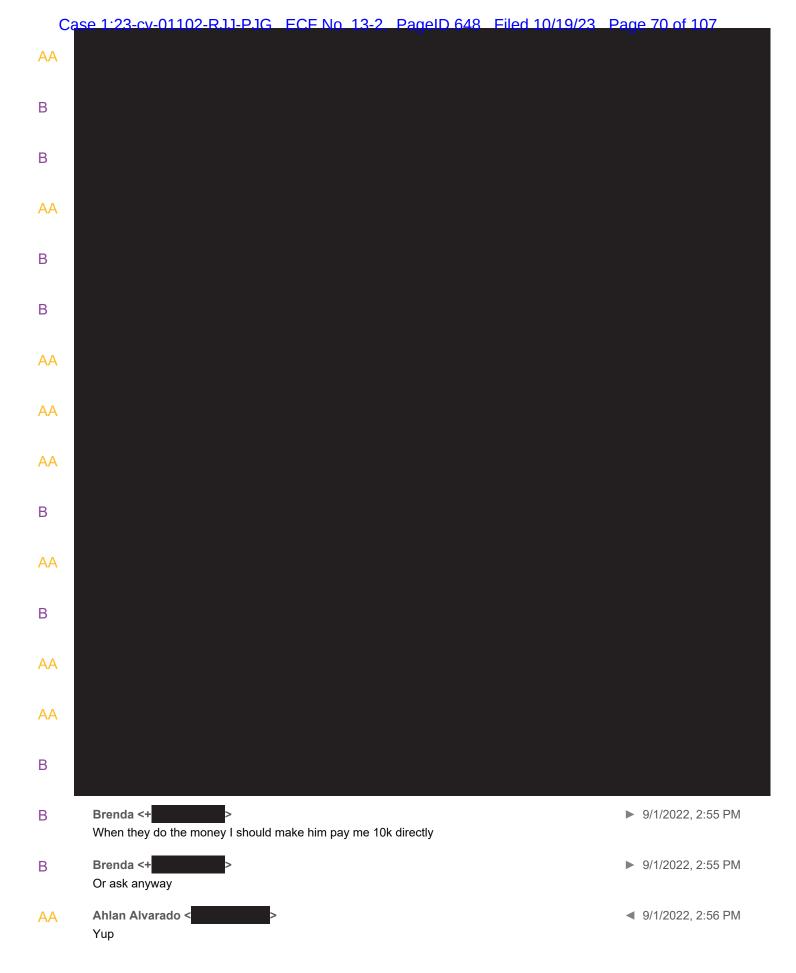
Conversations: 1	Participants: 2
Total Messages: 77	Date Range: 8/31/2022 - 9/1/2022

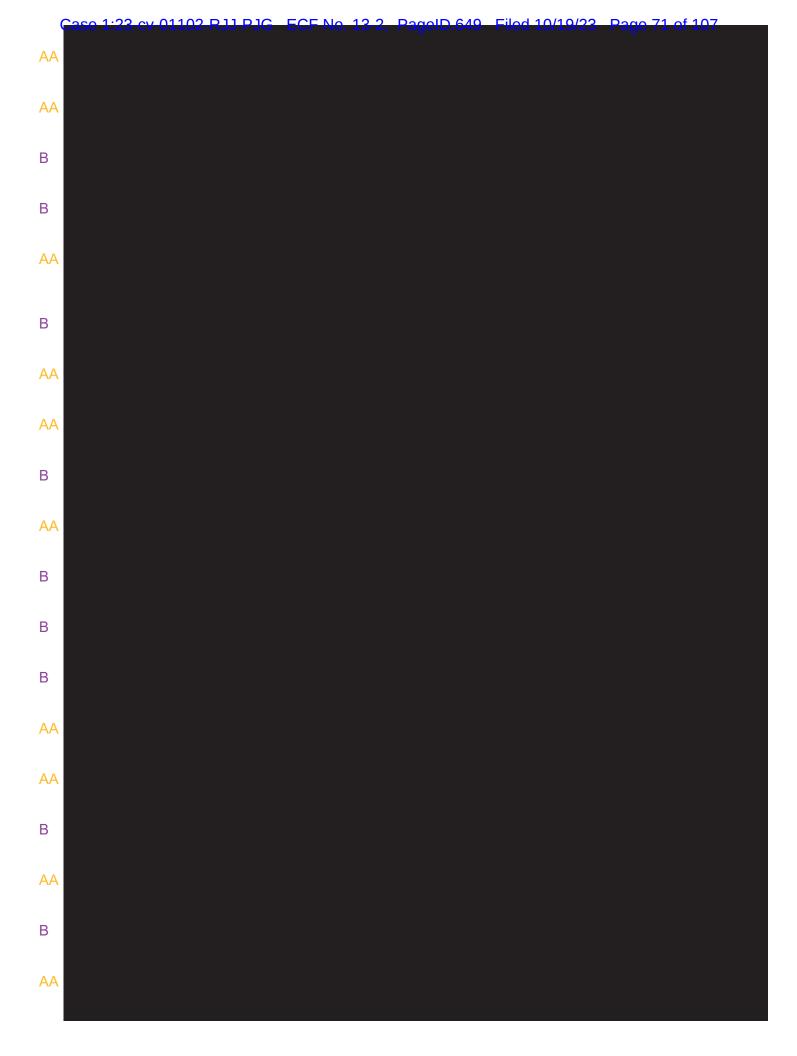
#### **Outline of Conversations**



#### **Messages in chronological order** (times are shown in GMT -04:00)







# Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.651 Filed 10/19/23 Page 73 of 107

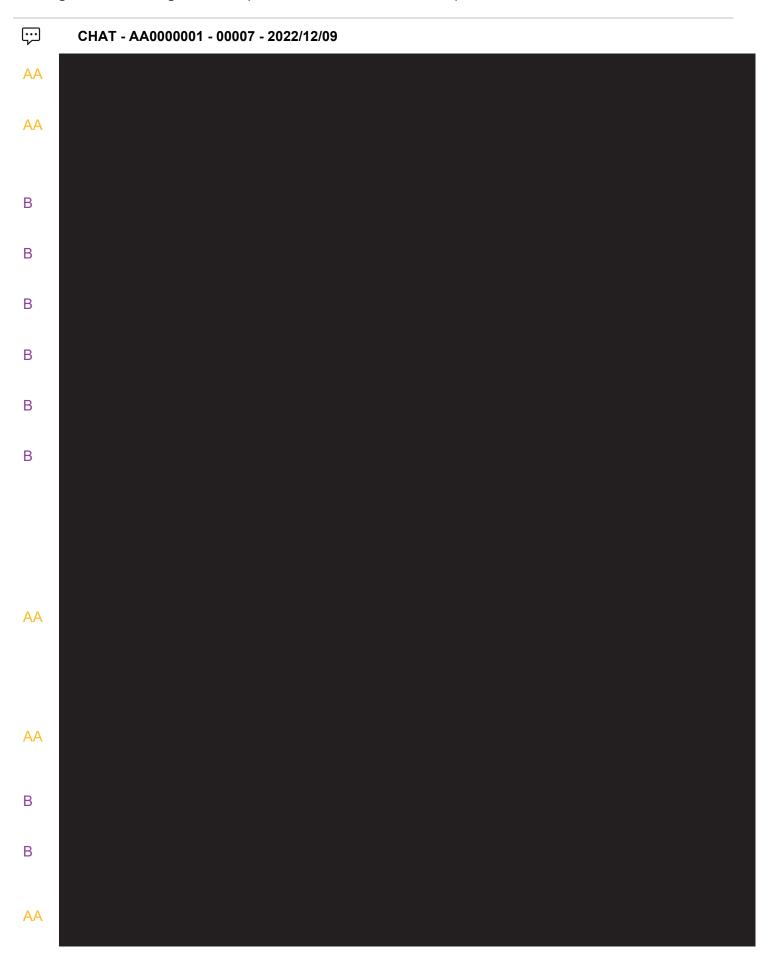
## **Short Message Report**

Conversations: 1	Participants: 2
Total Messages: 32	Date Range: 12/9/2022

### **Outline of Conversations**



CHAT - AA0000001 - 00007 - 2022/12/09 • 32 messages on 12/9/2022 • Ahlan Alvarado <(

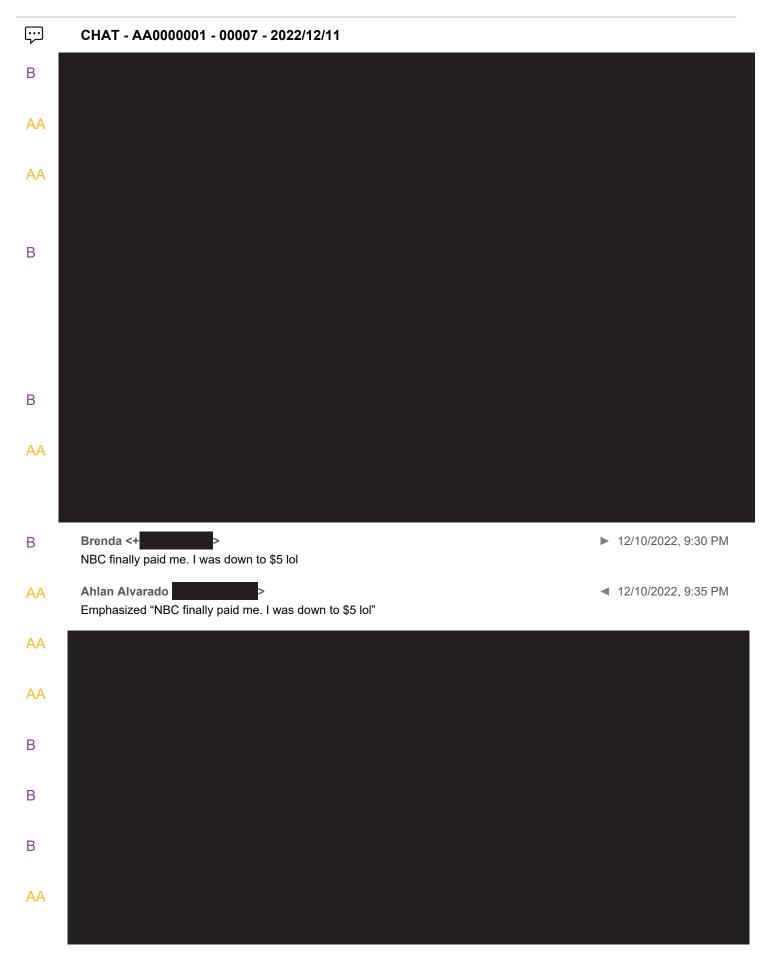


# Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.655 Filed 10/19/23 Page 77 of 107

## **Short Message Report**

Conversations: 1	Participants: 2
Total Messages: 17	Date Range: 12/10/2022 - 12/11/2022





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# Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.658 Filed 10/19/23 Page 80 of 107

## **Short Message Report**

Conversations: 1	Participants: 2
Total Messages: 24	Date Range: 12/19/2022 - 12/20/2022



# $\Box$ CHAT - AA0000001 - 00007 - 2022/12/20 Brenda <+1 В ► 12/19/2022, 7:58 PM So apparently I was supposed to be paying down 2018 taxes and not staying caught up on the other years bc now the IRS wants their money. I have to come up with 25k over the next 6 weeks. No one told me to pay on the earliest year first. I guess I should have known tho. What a fucking mess. It doesn't even matter now what I can pay a month or anything. В AA В В В AA В AA AA В В AA В

# Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.660 Filed 10/19/23 Page 82 of 107

AAAhlan Alvarado < ■ 12/19/2022, 8:05 PM He does Ahlan Alvarado < ■ 12/19/2022, 8:07 PM AAAnd who knows maybe that plan is you paying in full Brenda <+ ▶ 12/19/2022, 8:08 PM В From your mouth to Gods ears. I'm just trying to stay positive. Brenda <+ В ► 12/19/2022, 8:08 PM Having the IRS after me in a way that is known publicly surely won't help my lawsuit.

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# Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.661 Filed 10/19/23 Page 83 of 107

## **Short Message Report**

Conversations: 1	Participants: 2
Total Messages: 37	Date Range: 2/26/2023 - 2/27/2023





Attached URL: https://p68-content.icloud.com/MB80069A1FD1CD109A4EB28443B499D79D690E253E22F5F01069C1A370E1DCFF3.C01USN00Attachment Title: Screenshot 2023-02-27 at 9.43.46 AM.jpeg



Image: Screenshot 2023-02-27 at 9.43.46 AM.jpeg (276 KB)

B Brenda <+ >

► 2/27/2023, 12:44 PM

Attached URL: https://p68-content.icloud.com/MB80069A1FD1CD109A4EB28443B499D79D690E253E22F5F01069C1A370E1DCFF3.C01USN00At tachment Title: Screenshot 2023-02-27 at 9.44.33 AM.jpeg

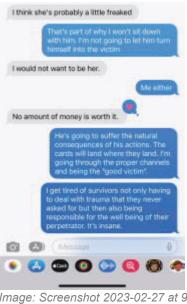


Image: Screenshot 2023-02-27 at 9.44.33 AM.jpeg (418 KB)

Brenda <+ ► 2/27/2023, 12:45 PM В Staying the course. They didn't meet with MSU today but her and Jennifer are talking again tomorrow morning Ahlan Alvarado < ■ 2/27/2023, 12:45 PM AA Yup stay the course! Brenda <+ В ► 2/27/2023, 12:45 PM Loved "Yup stay the course! "



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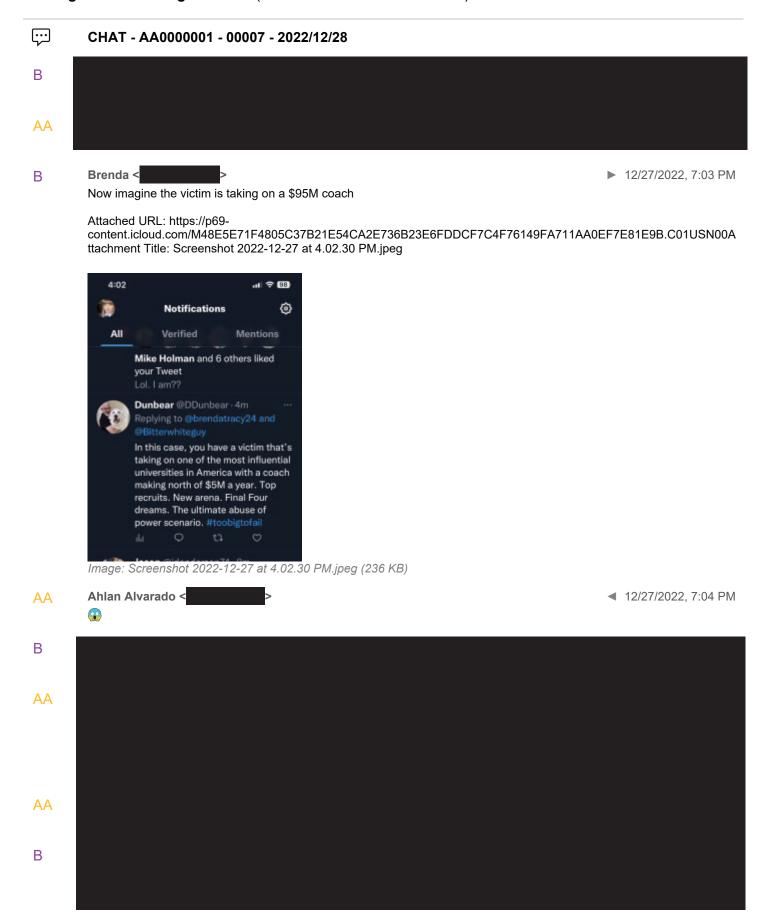
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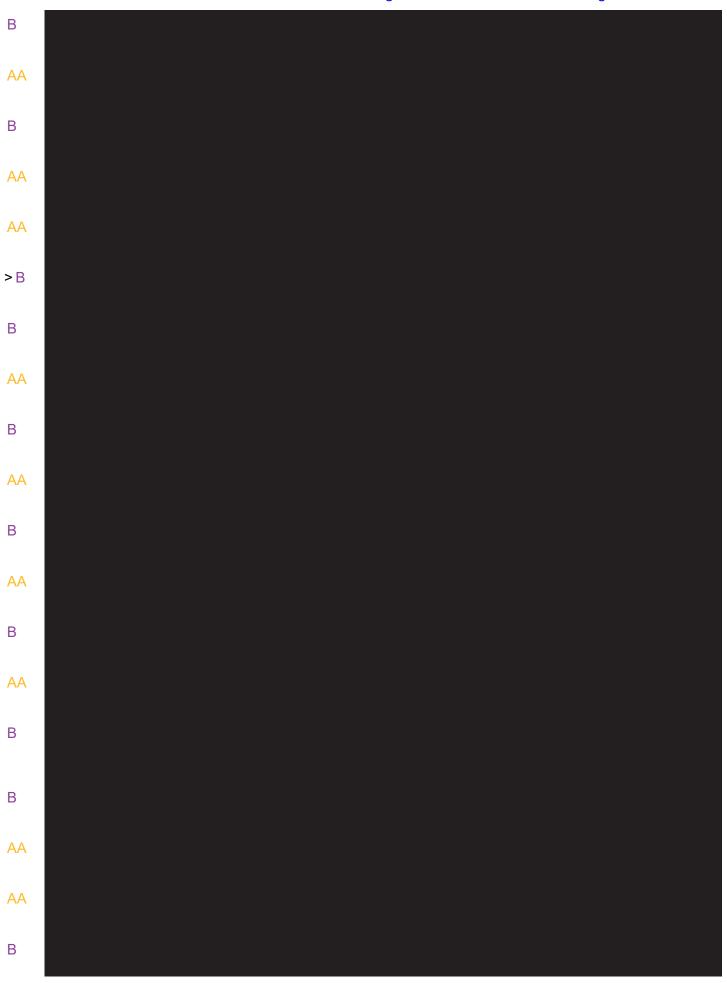
# Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.666 Filed 10/19/23 Page 88 of 107

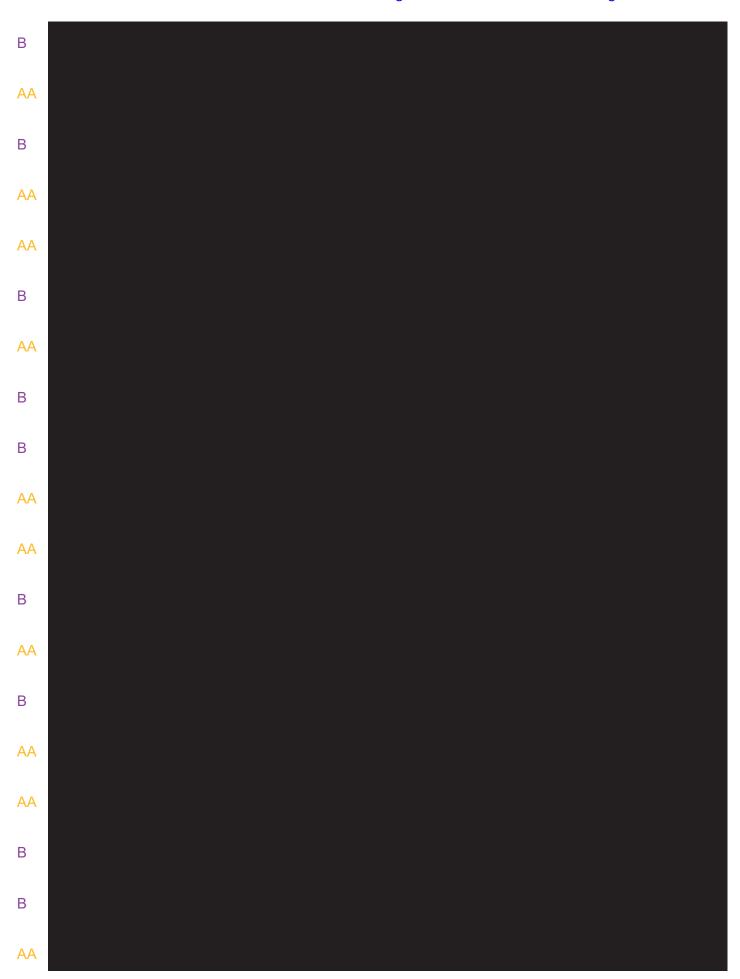
## **Short Message Report**

Conversations: 1	Participants: 2
Total Messages: 46	Date Range: 12/27/2022 - 12/28/2022







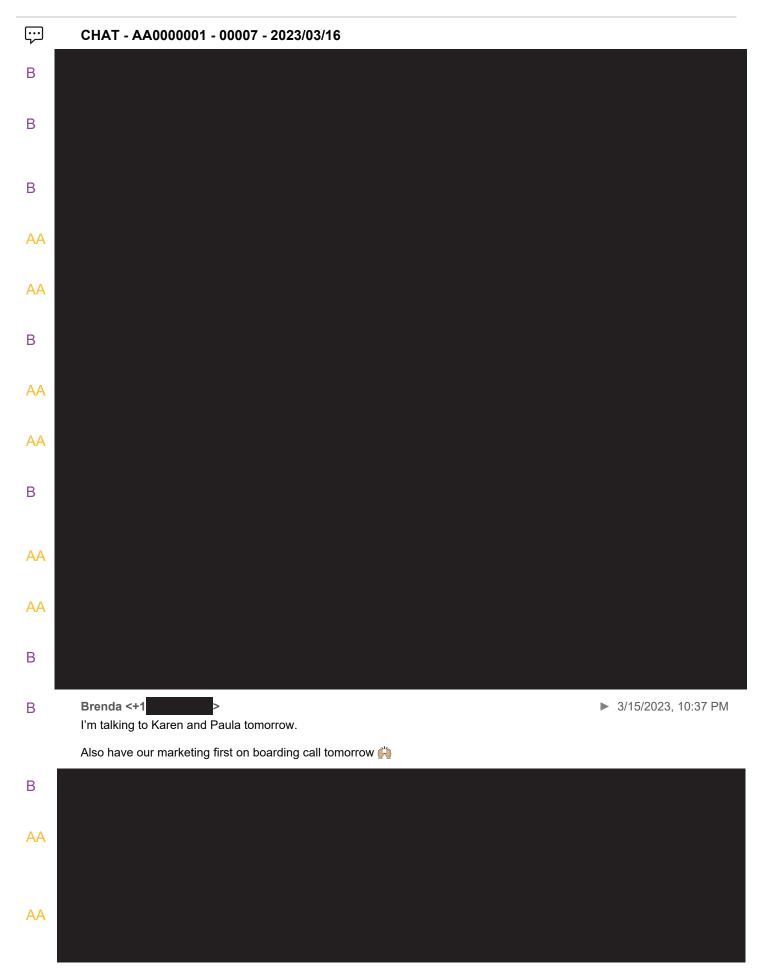


# Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.671 Filed 10/19/23 Page 93 of 107

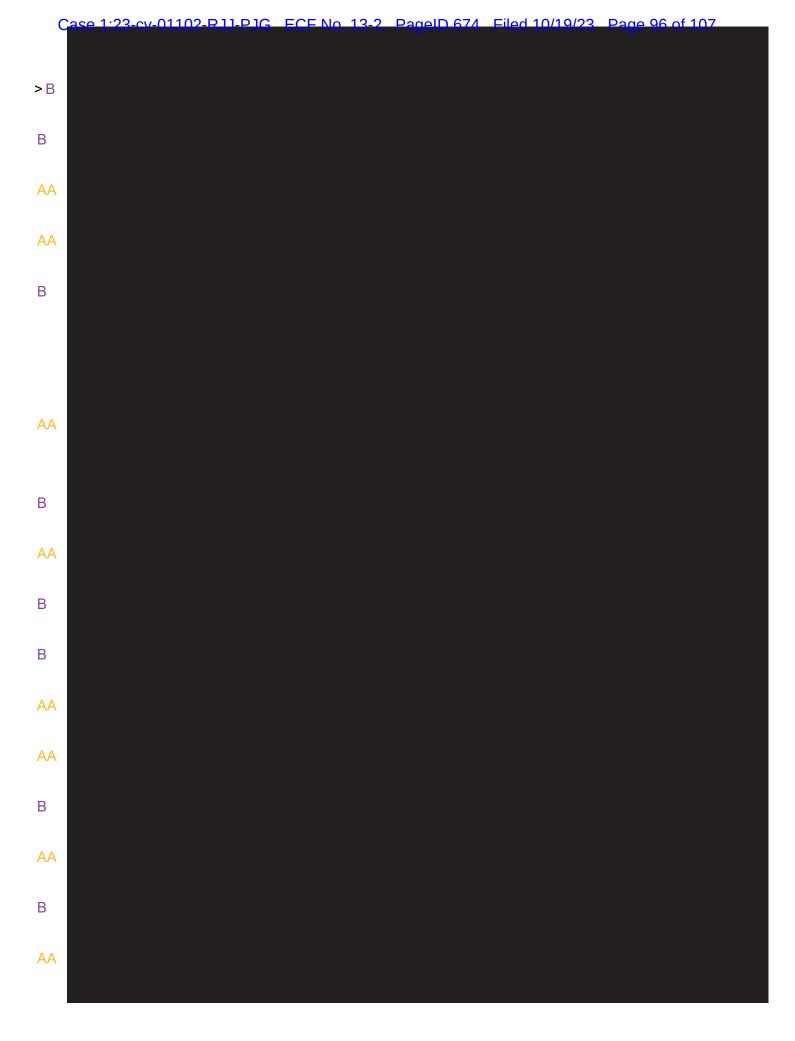
## **Short Message Report**

Conversations: 1	Participants: 2
Total Messages: 54	Date Range: 3/15/2023 - 3/16/2023









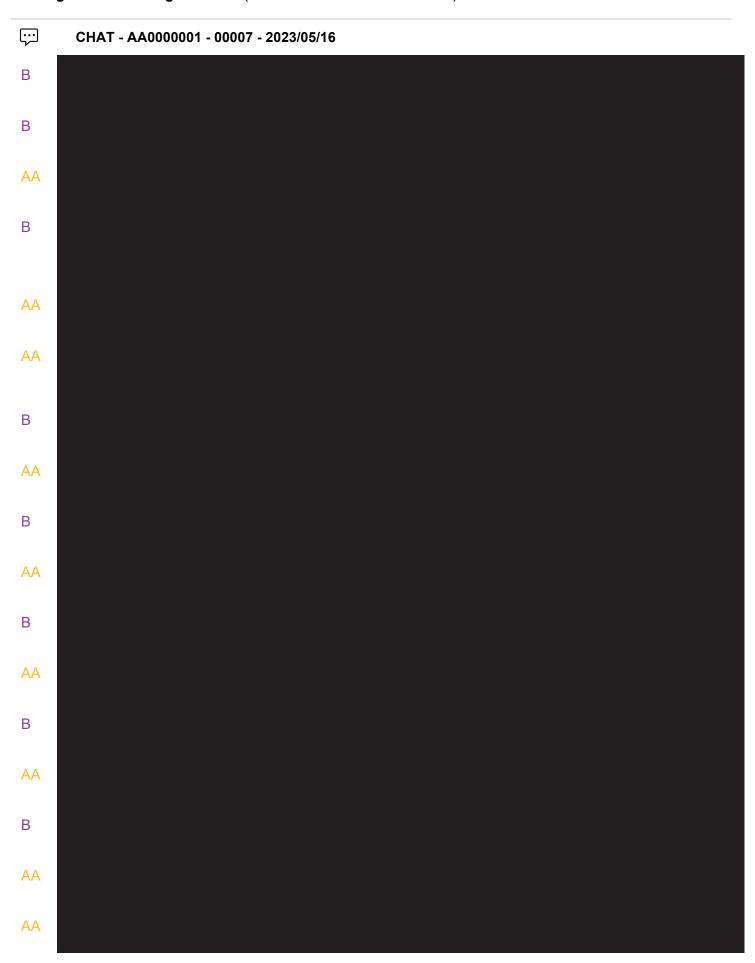


# Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.676 Filed 10/19/23 Page 98 of 107

## **Short Message Report**

Conversations: 1	Participants: 2
Total Messages: 45	Date Range: 5/15/2023 - 5/16/2023







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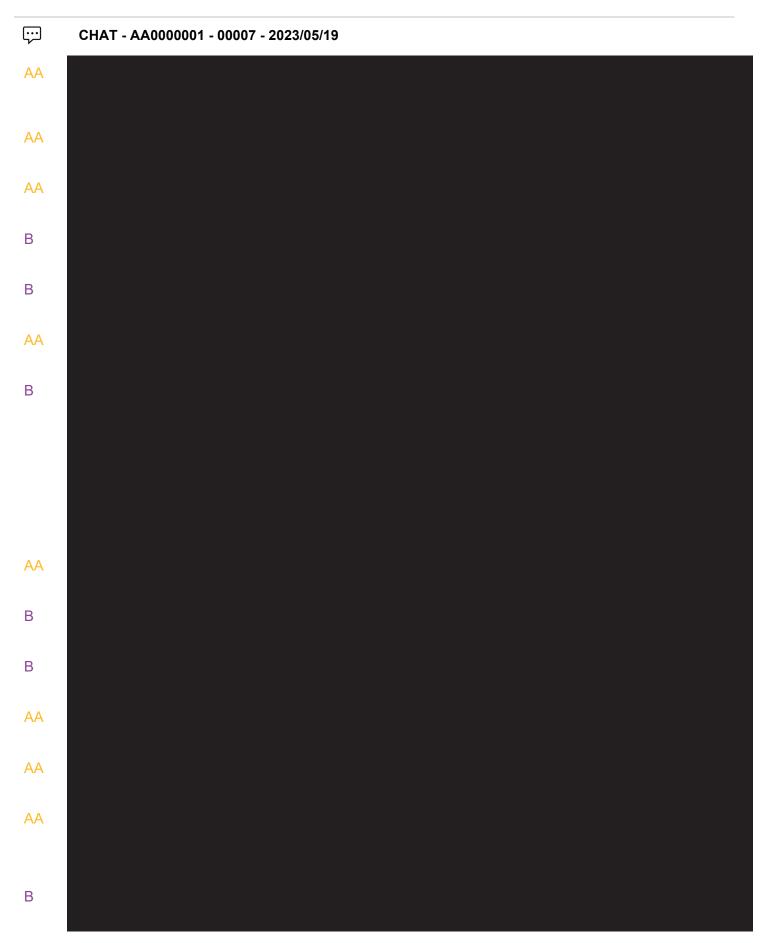


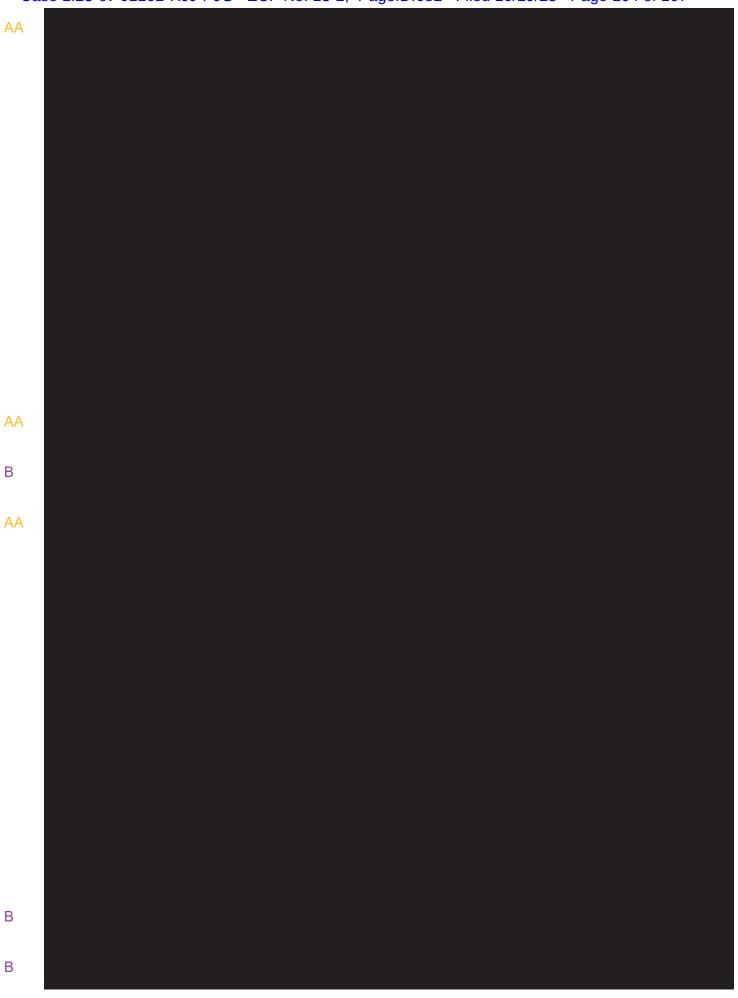
# Case 1:23-cv-01102-RJJ-PJG ECF No. 13-2, PageID.680 Filed 10/19/23 Page 102 of 107

## **Short Message Report**

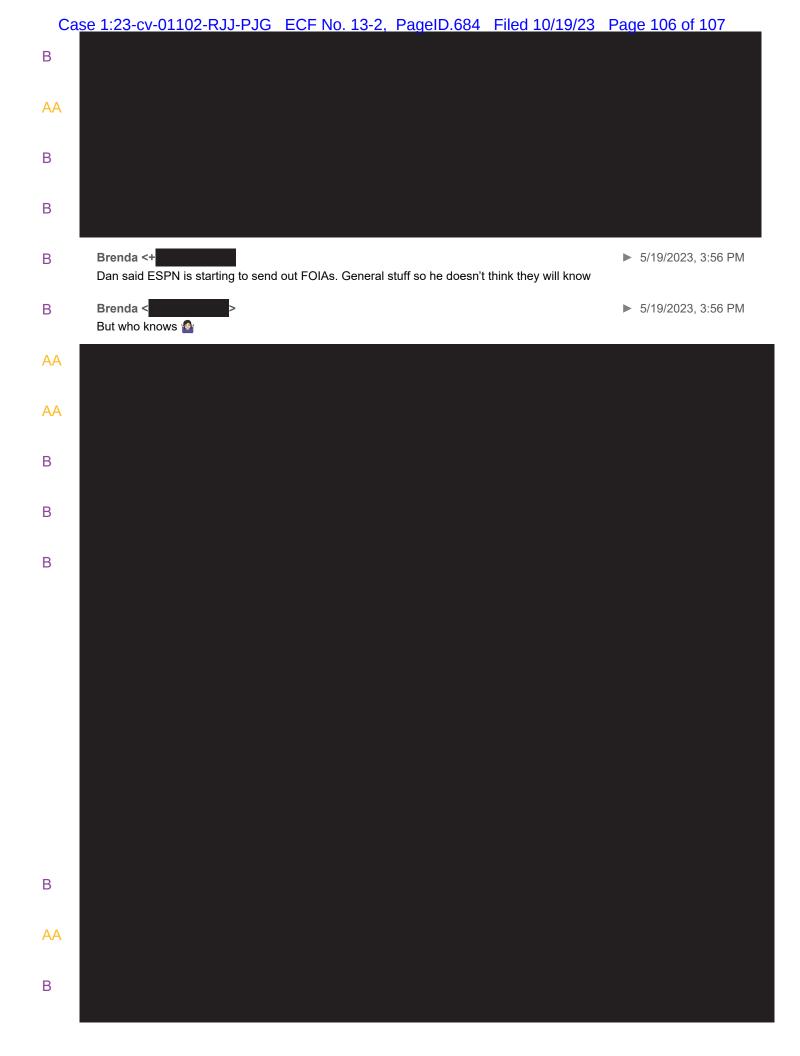
Conversations: 1	Participants: 2
Total Messages: 69	Date Range: 5/18/2023 - 5/19/2023







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